

# **EXHIBIT B**

EXHIBIT

11/11/22

3  
CR

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF CONNECTICUT

In Re

\* Chapter 11

\*

\*

\*

\* Case 22-50073 (JAM)

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

Ho Wan Kwok - April 6, 2022

2

## APPEARANCES:

For the Debtor:	WILLIAM R. BALDIGA, ESQ. BEN SILVERBERG, ESQ. Brown Rudnick, LLP Seven Times Square New York, NY 10036
For the U.S. Trustee:	HOLLEY E. CLAIBORN, ESQ. STEVEN MACKEY, ESQ. Office of the U.S. Trustee 150 State Street New Haven, CT 06510
For Logan Cheng, Creditor:	JAY MARSHALL WOLMAN, ESQ. Randazza Legal Group 100 Pearl Street, 14th Floor Hartford, CT 06103
For Pacific Alliance Asia Opportunity Fund, LP, Creditors:	DAVID V. HARBACH, II, ESQ. O'Melveny & Myers, LLP 1625 I Street NW Washington, DC 20006
	STUART SARNOFF, ESQ. MAKENZIE RUSSO O'Melveny & Myers, LLP Times Square Tower 7 Times Square New York, NY 10036
	ANNECCA SMITH, ESQ. Robinson and Cole 280 Trumbull Street Hartford, CT 06103
For Bruno Wu, Weican Meng and Rui Ma, Creditors:	KRISTEN MAYHEW, ESQ. McElroy, Deutsch, Mulvaney & Carpenter One State Street Hartford, CT 06103
For the Official Committee of Unsecured Creditors:	STEVEN STAFSTROM, ESQ. Pullman & Comley 850 Main Street Bridgeport, CT 06601

Ho Wan Kwok - April 6, 2022

3

1 MS. CLAIBORN: Good morning. Today is  
2 Wednesday, April 6th, 2022. We are gathered for the  
3 continued meeting of creditors in the Chapter 11  
4 case of Ho Wan Kwok, case no. 22-50073.

5 My name is Holley Claiborn. I'm a trial  
6 attorney in the Office of the United States Trustee  
7 and I will be conducting today's meeting. Today's  
8 meeting is being recorded on a digital recorder and  
9 is also available for parties to participate on the  
10 phone. And there are parties, including the debtor  
11 and counsel and other professionals, gathered here  
12 in person.

13 Today's meeting is being interpreted, as  
14 you can hear and our interpreter today is Jeff and  
15 I'm going to ask Jeff to respond to this oath.

16 (The interpreter is sworn.)

17 THE COURT: On behalf of Mr. Kwok we have  
18 William Baldiga and Ben Silverberg.

19 Also on behalf of the debtor we have  
20 financial professionals Craig Gelbert and Matthew  
21 Flynn.

22 Present here today on behalf of the  
23 Committee of Unsecured Creditors is Steven Stafstrom  
24 from Pullman and Comley.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

4

1                   Mr. Stafstrom is the lawyer for the  
2 Official Committee of Unsecured Creditors.

3                   Also present today on behalf of PAACS  
4 Stuart Sarnoff, David Harbach and MacKenzie Russo.  
5 They represent PAACS.

6                   On behalf of certain creditors, including  
7 Rui Ma, we have Kristen Mayhew.

8                   On behalf of creditor, Logan Cheng, we  
9 have Jay Wolman.

10                  Also on behalf of PAACS we have Annecca  
11 Smith, from Robinson and Cole.

12                  And then also for the debtor today we have  
13 Josh Klein and Aaron Mitchell.

14                  Today's meeting will feature me asking  
15 questions first, followed by the opportunity for  
16 creditors to come up and ask questions.

17                  Is anyone on the telephone conference  
18 line?

19                  MR. MACKEY: Steven Mackey from the U.S.  
20 Trustee's Office is on the conference line.

21                  Thank you, Mr. Mackey. Anyone else  
22 besides Mr. Mackey.

23                  Hearing none, I'm going to proceed to  
24 swearing in Mr. Kwok.

25                  (The debtor is sworn.)

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

5

1 MS. CLAIBORN: Mr. Kwok, as you know,  
2 today's meeting is being recorded and Mr. Jeff here  
3 is our official interpreter for today.

4 Jeff will be interpreting the questions  
5 that I ask and your answers, and I ask that you wait  
6 until Jeff has made a full translation before you  
7 answer my questions.

8 EXAMINATION BY MS. CLAIBORN:

9 Q Mr. Kwok, we're going to pick up today in  
10 an area that we left off in general from the last  
11 meeting of creditors that was held back on March  
12 21st, 2022.

13 Has anything changed in your employment  
14 status since March 21st, 2022?

15 A No.

16 Q Has anything changed with respect to your  
17 residence?

18 A No.

19 Q During the meeting held on March 21st,  
20 2022 I asked you about the accuracy of your  
21 bankruptcy schedules and your bankruptcy statement  
22 of financial affairs.

23 A No change.

24 Q Thank you.

25 MS. CLAIBORN: Jeff, for purposes of my

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

6

1       questions I'm going to be following the documents  
2       that are in front of you. When I say schedules, it's  
3       this document. And then this document is the  
4       statement of financial affairs. Okay? And when I  
5       refer to an ECF number, it's at the top of the page.

6                     THE OFFICIAL INTERPRETER: ECF number.

7       Okay.

8                     MS. CLAIBORN: Okay? That should allow  
9       you to follow along and start on this page.

10          EXAMINATION BY MS. CLAIBORN:

11          Q        Okay. Mr. Kwok, I'm going to ask you to  
12       make sure you have in front of you, which you appear  
13       to do, Schedules A-B through J.

14                     THE PRIVATE INTERPRETER: He has Mandarin  
15       translations in front of him.

16          BY MS. CLAIBORN:

17          Q        I see that Mr. Baldiga, who is seated next  
18       to you, has English versions. But in front of you,  
19       Mr. Kwok, appear to be translations. Is that  
20       accurate?

21          A        Just on Schedule A-B.

22          Q        Okay. So, Mr. Kwok, when you're answering  
23       my questions today, you're going to be taking a look  
24       at your own translated versions of the bankruptcy  
25       schedules.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

7

1 A Okay.

2 Q Okay.

3 THE PRIVATE INTERPRETER: Just a minute,  
4 Your Honor.

5 MS. CLAIBORN: Yes.

6 THE PRIVATE INTERPRETER: I'm having a  
7 little difficulty hearing the interpreter when he  
8 interprets the witness's answers.

9 MS. CLAIBORN: Okay. So, Jack, if you  
10 could speak up. I'm going to move the microphone.

11 THE OFFICIAL INTERPRETER: Oh, okay.

12 MS. CLAIBORN: See if that works.

13 BY MS. CLAIBORN:

14 Q Okay. Mr. Kwok, starting at Question No.  
15 1 on Schedule A-B. With respect to Schedule A-B at  
16 Question No. 1, that asks if you own any legal or  
17 equitable interest in any real estate residence or  
18 building or similar property. Your answer to that  
19 Question No. 1 was no, Mr. Kwok. Is that an  
20 accurate answer?

21 A Yes.

22 Q Mr. Kwok, have you owned any real estate  
23 between the year 2018 and your bankruptcy filing in  
24 February of 2022?

25 THE OFFICIAL INTERPRETER: Can you repeat

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

8

1 that one?

2 BY MS. CLAIBORN:

3 Q Have you owned any real estate between the  
4 year 2018 and your bankruptcy filing in February  
5 2022?

6 THE OFFICIAL INTERPRETER: Can you repeat  
7 that one? He said he didn't hear that.

8 BY MS. CLAIBORN:

9 Q Mr. Kwok --

10 MR. BALDIGA: I'm sorry. I couldn't hear.

11 THE OFFICIAL INTERPRETER: He said that he  
12 didn't understand the translation. I just want to  
13 make sure I understand first.

14 MS. CLAIBORN: I'll repeat the question.

15 THE OFFICIAL INTERPRETER: Yes.

16 BY MS. CLAIBORN:

17 Q Mr. Kwok, have you owned any real estate  
18 between 2018 and February of 2022?

19 A No.

20 Q Mr. Kwok, as of the bankruptcy filing in  
21 February 2022, did you have any equitable interest  
22 in any real estate anywhere in the world?

23 A No.

24 Q Mr. Kwok, as of the bankruptcy filing in  
25 February 2022, did you have any legal interest in

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

9

1 any real estate anywhere in the world?

2 A No.

3 Q Mr. Kwok, have you ever owned any real  
4 estate in Hong Kong?

5 A No.

6 THE PRIVATE INTERPRETER: What was the  
7 answer?

8 THE OFFICIAL INTERPRETER: No.

9 BY MS. CLAIBORN:

10 Q Mr. Kwok, have you ever owned the property  
11 located at 16A South Bay Road, Hong Kong?

12 A No.

13 Q Mr. Kwok, do you currently own an  
14 apartment at the Sherry Netherland in New York City?

15 THE OFFICIAL INTERPRETER: I didn't get  
16 it. Can I ask him repeat the -- repeat the answer?

17 MR. BALDIGA: You have to say -- whatever  
18 you're going to say, you have to -- you're talking  
19 to everybody, not just Holley, so I need to hear  
20 what you're saying.

21 THE OFFICIAL INTERPRETER: Okay. I just -  
22 - I just want to ask him to repeat -- repeat the  
23 answer.

24 MR. BALDIGA: Okay.

25 THE OFFICIAL INTERPRETER: Okay?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

10

1                   THE WITNESS: I don't own that real estate  
2       in New York, the Sharon -- the Sharons -- at that  
3       address I don't remember, and I own -- I own 50  
4       percent the stock -- the stock and --

5                   THE PRIVATE INTERPRETER: No.

6                   THE OFFICIAL INTERPRETER: No?

7                   THE PRIVATE INTERPRETER: No.

8                   THE OFFICIAL INTERPRETER: Okay.

9                   THE WITNESS: For the family.

10                  MS. CLAIBORN: Can I ask you not to  
11       interrupt? Can you just wait until the end and then  
12       --

13                  THE PRIVATE INTERPRETER: Okay.

14                  MS. CLAIBORN: -- you can express whatever  
15       it is you want to say?

16                  THE PRIVATE INTERPRETER: Okay.

17                  MS. CLAIBORN: Can you please just  
18       translate Mr. Kwok's answer again?

19                  THE OFFICIAL INTERPRETER: Yeah. I just  
20       want to repeat, make sure -- and I said it right,  
21       you know, what he said.

22                  THE WITNESS: So, yeah, he -- he said, I  
23       owe -- I own 50 percent of the -- 50 percent, but I  
24       don't own the whole real estate, but I just  
25       represent the family.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

11

1 BY MS. CLAIBORN:

2 Q Mr. Kwok, what do you own 50 percent of?

3 A Bravo Luck, 50 percent of the stock powder  
4 -- power. I don't know. I don't understand.

5 THE PRIVATE INTERPRETER: (Indiscernible.)

6 THE OFFICIAL INTERPRETER: He owned -- he  
7 said he owns the 50 percent of it.

8 THE PRIVATE INTERPRETER: -- we can hear  
9 you fine, Holley.

10 MS. CLAIBORN: Okay. I'm going to ask --  
11 I'm going to --

12 THE PRIVATE INTERPRETER: I don't know if  
13 the microphone is connected to anything.

14 MS. CLAIBORN: It is. It is. Jeff, if  
15 you can speak up?

16 THE OFFICIAL INTERPRETER: Mr. Kwok said  
17 he owe -- he owns 50 percent of -- of the stock. Is  
18 it like the stock of the real estate or something?  
19 I don't know. I don't get it. But you can help if  
20 she wants to help. Do you want him to help a little  
21 bit?

22 MS. CLAIBORN: I'd rather not.

23 THE OFFICIAL INTERPRETER: Okay.

24 MS. CLAIBORN: So, I'll just -- I'll ask  
25 follow-up questions.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

12

1 THE OFFICIAL INTERPRETER: Okay.

2 MR. BALDIGA: All right. But I need to  
3 hear if it's a misinterpretation, so --

4 MS. CLAIBORN: I'm going to ask a  
5 clarifying question, if I could.

6 BY MS. CLAIBORN:

7 Q Mr. Kwok, do you own 50 percent of a  
8 company called Bravo Luck?

9 A I represent my family to hold 50 percent  
10 of the stock.

11 Q Mr. Kwok, when you use the term --

12 MR. BALDIGA: Could I hear that back?  
13 Could you repeat that?

14 THE OFFICIAL INTERPRETER: Yeah. I  
15 represent my family to hold 50 percent of the stock  
16 of the -- of the company.

17 MR. BALDIGA: Okay.

18 BY MS. CLAIBORN:

19 Q Mr. Kwok, when you say family, what do you  
20 mean?

21 A My family is a big family and that  
22 includes a lot of people. My kids and my sister-in-  
23 laws, and all people together. A lot of people.

24 Q Mr. Kwok, who owns an interest --

25 MR. BALDIGA: Excuse me. We do have an

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

13

1 interpretation question.

2 THE PRIVATE INTERPRETER: I just want to  
3 ask that, is there supposed to be summary of the  
4 (indiscernible) the interpretation?

5 MS. CLAIBORN: To the best of Mr. Jeff's  
6 ability, it should be verbatim.

7 THE PRIVATE INTERPRETER: Right. So if  
8 Mr. Kwok said, my son, my daughter, my brother, my  
9 sister-in-law, my nephew, my niece, many people,  
10 then if the interpreter say, well, a lot of my  
11 families and my brother, many people, then should it  
12 be correct or not?

13 MS. CLAIBORN: I would prefer that Mr.  
14 Jeff translate as literally as possible. So with  
15 that instruction, can we --

16 THE OFFICIAL INTERPRETER: Yeah.

17 MS. CLAIBORN: -- do a specific job as  
18 best we can going forward? Thank you.

19 MR. BALDIGA: Thank you.

20 BY MS. CLAIBORN:

21 Q So, Mr. Kwok, who owns the company called  
22 Bravo Luck?

23 A My son.

24 Q And what is your son's name?

25 A Cheng Wu.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

14

1 Q How long has your son owned Bravo Luck?

2 A I don't remember.

3 THE PRIVATE INTERPRETER: Say again,  
4 please.

5 THE OFFICIAL INTERPRETER: I don't  
6 remember.

7 BY MS. CLAIBORN:

8 Q So, Mr. Kwok, what do you own 50 percent  
9 of when you explained your ownership interest in the  
10 Southern Sherry Netherland?

11 MR. BALDIGA: Objection. You may  
12 interpret.

13 THE OFFICIAL INTERPRETER: Can you repeat  
14 that one again, Holley?

15 BY MS. CLAIBORN:

16 Q Mr. Kwok, you testified that you owned 50  
17 percent of some company, and that was in response to  
18 my question if you owned the Sherry Netherland  
19 apartment. Can you please explain what you meant?

20 A Sherry is a co-op. It doesn't have the --  
21 it doesn't have the -- it doesn't have the  
22 ownership.

23 THE PRIVATE INTERPRETER: May I, Ms.  
24 Holley?

25 MR. BALDIGA: Yes, of course.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

15

1                   THE PRIVATE INTERPRETER: You've got to  
2 speak louder.

3                   MS. CLAIBORN: Okay. I'm going to put  
4 ourselves on pause for a second here.

5                   (Off the record)

6                   MS. CLAIBORN: All right. We're back on  
7 the record after a short break, and, Mr. Kwok, you  
8 remain under oath.

9                   Jeff, could you please retranslate?

10                  THE OFFICIAL INTERPRETER: Yeah.

11                  MS. CLAIBORN: The last question. You  
12 want me to ask it again?

13                  THE OFFICIAL INTERPRETER: Yeah. Would  
14 you ask it again?

15                  MS. CLAIBORN: All right. I'll try it  
16 again.

17                  BY MS. CLAIBORN:

18                  Q        Mr. Kwok, you testified today that you own  
19 50 percent of an interest in some company, and that  
20 was the answer you gave me in response to my  
21 question if you own an apartment at the Sherry  
22 Netherland. Can you please explain your answer?

23                  MR. BALDIGA: Objection.

24                  THE WITNESS: I don't know how to explain  
25 it. He said the Sherry Netherland is a co-op. I

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

16

1       don't have a deed on that property and I just  
2 represent my family to own 50 percent of the right.

3                   MR. BALDIGA: Excuse me. Go ahead.

4                   THE PRIVATE INTERPRETER: Because that --  
5 Mr. Kwok did mention the company name Bravo Luck, so  
6 Mr. Interpreter did not say the word Bravo Luck, the  
7 company that holds the interest of Sherry  
8 Netherland, and Mr. Kwok represents the family owns  
9 50 percent of Bravo Luck, which is the holding  
10 company of owning the Sherry Netherland. The Sherry  
11 Netherland is a co-op.

12                  MR. BALDIGA: So I'm going to make a  
13 continuing objection to the extent that the  
14 interpreter is not providing the exact words used by  
15 the witness. I'm not ascribing any faults or  
16 anything, but obviously that's critical to the  
17 quality of the testimony and that's necessary.

18                  MS. CLAIBORN: We need --

19                  MR. BALDIGA: We have to use the words  
20 used by the witness.

21                  MS. CLAIBORN: I'm sure that Jeff is going  
22 to do his best job today to try to translate  
23 everything literally.

24                  MR. BALDIGA: Thank you.

25                  MS. CLAIBORN: But please understand that

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

17

1 there is a familiarity with terms in this room that  
2 Mr. Jeff does not have. So to the extent that  
3 people are answering questions with shorthand  
4 versions of company names or just one words, the  
5 answer should be as specific as possible --

6 THE OFFICIAL INTERPRETER: Yeah, I --

7 MS. CLAIBORN: -- if you could translate  
8 that.

9 THE OFFICIAL INTERPRETER: -- my best but  
10 probably that interpreter honestly, Holley, the  
11 interpreter probably know the case more, the  
12 details.

13 MS. CLAIBORN: I agree. Can you just --

14 THE OFFICIAL INTERPRETER: But if he --

15 MS. CLAIBORN: -- can you translate what I  
16 just said to Mr. Kwok, because I want to make sure  
17 --

18 THE OFFICIAL INTERPRETER: Oh.

19 MS. CLAIBORN: -- he answers questions in  
20 a way that are easily translatable.

21 THE OFFICIAL INTERPRETER: I just tell him  
22 and the answer let -- you know short and clear, but  
23 I pretty much understand what he says and --

24 MS. CLAIBORN: And can you please  
25 translate Mr. Kwok's answers or comments to your

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

18

1 comments?

2 THE OFFICIAL INTERPRETER: He said he will  
3 try to make it a shorter and clear and -- but he  
4 needs to explain the details as much as he can  
5 because it's a -- it's related to his lifeline.

6 MS. CLAIBORN: Mr. Sarnoff?

7 MR. SARNOFF: Yeah. I just wanted to make  
8 clear that to the extent there is a discrepancy  
9 between the interpreter -- the translator, the  
10 official translator and Mr. Kwok's interpreter, that  
11 the translator is the final arbiter and that unless  
12 the translator agrees with the translation  
13 difference that the interpreter is putting forth,  
14 they have to work that out before we can defer to  
15 the -- to Mr. Kwok's personal interpreter as what  
16 Mr. Kwok said.

17 MR. BALDIGA: I don't accept that.

18 MR. SARNOFF: That's fine.

19 MR. BALDIGA: That can be your position.

20 MR. SARNOFF: Okay. The position has to  
21 be that the translator has to agree with the  
22 interpreter about what Mr. Kwok said for the record  
23 to be accurate.

24 MR. BALDIGA: That -- I understand your  
25 position.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

19

1                   THE OFFICIAL INTERPRETER: So, Holley, if  
2 I miss anything that his personal interpreter wants  
3 to make up whatever I'm missing, some of the detail  
4 information, and is it okay for her to add on and if  
5 I agree what -- you know, what I'm missing or what  
6 he said, maybe I'm missing some detail information  
7 and some --

8                   MS. CLAIBORN: I think the better route  
9 for today --

10                  THE OFFICIAL INTERPRETER: Yeah.

11                  MS. CLAIBORN: -- and for purposes of a  
12 clear translation and a clear record --

13                  THE OFFICIAL INTERPRETER: Okay.

14                  MS. CLAIBORN: -- is for you, Jeff, to  
15 interpret --

16                  THE OFFICIAL INTERPRETER: Uh-huh.

17                  MS. CLAIBORN: -- my questions and to  
18 interpret Mr. Kwok's answers.

19                  THE OFFICIAL INTERPRETER: Okay.

20                  MS. CLAIBORN: And if Mr. Kwok thinks,  
21 based on your interpretation, that you have not  
22 translated properly, then he can testify again and  
23 you can try again.

24                  But I would like to restrict the  
25 interaction that happens between translators and

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

20

1       between Mr. Kwok's personal translator so that we  
2       have an official record where the person asking the  
3       question is me, it's being officially translated,  
4       and Mr. Kwok is giving the answers, and that also is  
5       being officially translated.

6                    MR. BALDIGA: But, Holley, the problem  
7       with that is the witness doesn't know whether Jeff's  
8       English report is in fact accurate. You can't leave  
9       it up to the witness. That's why we have a check  
10      interpreter. If he spoke English, then we wouldn't  
11      need any interpreters. He can't do that.

12                  MS. CLAIBORN: I think as a practical  
13      matter, Mr. Kwok speaks enough English to know  
14      whether or not he's answered his question.

15                  MR. BALDIGA: No, he doesn't. I object.

16                  MS. CLAIBORN: Well, I -- I think that  
17      that has been what I have seen from my own personal  
18      experience.

19                  That said, we're going to try and do the  
20      best we can --

21                  MR. BALDIGA: I agree.

22                  MS. CLAIBORN: -- and we'll see where we  
23      go.

24                  MR. BALDIGA: Okay.

25                  MS. CLAIBORN: Okay?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

21

1 BY MS. CLAIBORN:

2 Q So back to questions and answers. Mr.  
3 Kwok, do you own an interest in Genever Holdings  
4 Corporation?

5 A I just have -- in reality, I don't, but I  
6 just held -- I just represent my family to hold some  
7 interest.

8 Q Is anyone authorized to act on behalf of  
9 Genever Holdings Corporation aside from you?

10 A My son.

11 Q Is there a document that memorializes your  
12 ownership interest, whatever it is, in Genever  
13 Holdings Corporation?

14 MR. BALDIGA: Objection. You -- you may  
15 answer.

16 THE WITNESS: No.

17 THE PRIVATE INTERPRETER: Ms. Holley, can  
18 I -- first of all, the last time that -- when he was  
19 saying -- instructing the witness about his  
20 testimony, what should it be, I don't think the  
21 interpreter -- the official interpreter interpreted  
22 your instruction. He is telling the witness what he  
23 should be doing, but not what you were saying.

24 And then, now that the witness is saying  
25 that he asked the interpreter twice that -- you were

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

22

1 talking about ownership, you were talking about  
2 ownership interest. Now he used twice these words,  
3 and then at the end, Mr. Jeff said, yes. And then,  
4 so he answered no, but then the interaction was not  
5 interpreted.

6 MS. CLAIBORN: Mr. Jeff, could you  
7 translate?

8 THE OFFICIAL INTERPRETER: I don't know  
9 what she just said. I don't know. I didn't  
10 understand what she's saying.

11 THE PRIVATE INTERPRETER: I mean, every  
12 word should be interpreted. The witness -- every  
13 word the witness says should be interpreted. Ms.  
14 Holley's words should be interpreted, right?

15 MS. CLAIBORN: Yes.

16 THE PRIVATE INTERPRETER: Right. But he  
17 will -- not interpreted Ms. Holley's -- and you did  
18 not interpret everything Mr. Kwok said.

19 THE OFFICIAL INTERPRETER: Okay. Maybe --  
20 maybe we should have her to interpret. I'm going to  
21 excuse myself. I don't know --

22 MS. CLAIBORN: I'm going to put the --

23 THE OFFICIAL INTERPRETER: -- I'm not  
24 familiar with --

25 MS. CLAIBORN: -- I'm going to put the

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

23

1 matter on pause for a moment.

2 THE OFFICIAL INTERPRETER: Yeah, yeah,  
3 yeah.

4 (Off the record)

5 MS. CLAIBORN: All right. We are back on  
6 the record after a short break.

7 Mr. Kwok, you remain under oath.

8 BY MS. CLAIBORN:

9 Q Mr. Kwok, do you have any United States  
10 currency with you today?

11 A No.

12 Q When you filed your bankruptcy case, did  
13 you have any United States currency?

14 A No.

15 Q Mr. Kwok, do you own any foreign currency?

16 A No.

17 Q Mr. Kwok, do you own any digital currency?

18 A No.

19 Q Mr. Kwok, do you have any financial  
20 accounts of any kind in the United States?

21 A No.

22 Q Mr. Kwok, do you have any financial  
23 accounts of any kind outside of the United States?

24 A No.

25 Q On March 21st, you testified you have no

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

1 job and no source of income. Who pays for your  
2 household expenses?

3 A Sometimes my son, sometimes my wife, or  
4 sometimes my other family member.

5 Q Do you have access to any credit cards?

6 A No.

7 Q Do you have access to any debit cards  
8 attached to a bank account?

9 A No.

10 Q How do you pay for groceries?

11 A My son, my wife, my family members'  
12 company pay for.

13 Q Where does your son live?

14 A London.

15 Q How does your son send you money?

16 A He has a family office in a company, New  
17 York.

18 Q Does the family office give you money?

19 A They pay the expenses above.

20 Q What does the term family office mean?

21 MR. BALDIGA: Objection. You may answer.

22 THE OFFICIAL INTERPRETER: Can I ask to --  
23 ask him to repeat?

24 MS. CLAIBORN: Yes.

25 THE OFFICIAL INTERPRETER: Okay. Can you

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

25

1 --  
2 MR. BALDIGA: Right. He also have to  
3 interpret for the witness what I say.

4 MS. CLAIBORN: You haven't said anything  
5 yet and he's going to ask him to repeat his answers  
6 so then he's going to translate, and then we can  
7 have whatever discussion you want to have.

8 THE PRIVATE INTERPRETER: The counsel  
9 raised objection. The interpreter did not interpret  
10 the objection.

11 MS. CLAIBORN: I can happily repeat the  
12 question, but we are not going to get anywhere today  
13 in a meaningful fashion if people are interrupting  
14 on basic questions.

15 MR. BALDIGA: No, I didn't interrupt, but

16 --

17 MS. CLAIBORN: So let me try again.

18 MR. BALDIGA: Okay. But hold on. If I  
19 object or if I say anything else, that has to be  
20 interpreted.

21 MS. CLAIBORN: You're not waiting for  
22 space to interpret. So, Mr. Jeff, can you interpret  
23 that exchange that just happened?

24 THE OFFICIAL INTERPRETER: Okay. I don't  
25 know. It's just too much interruption.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

26

1 MS. CLAIBORN: Right.

2 THE OFFICIAL INTERPRETER: Holley, I can't  
3 do -- keep doing this. I just too distracted and I  
4 don't know. It just a simple -- ask the witness  
5 just a simple repeat and then --

6 MS. CLAIBORN: Let me try --

7 THE OFFICIAL INTERPRETER: -- it gets all  
8 these people involved.

9 MS. CLAIBORN: Correct. Let me --

10 THE OFFICIAL INTERPRETER: We're not going  
11 anywhere.

12 MS. CLAIBORN: Let me try the question  
13 again.

14 BY MS. CLAIBORN:

15 Q Mr. Kwok, what do you mean by the term,  
16 family office?

17 MR. BALDIGA: Objection. You may answer.

18 MS. CLAIBORN: Mr. Baldiga, that term is  
19 all over the papers. Can you repeat -- translate?

20 THE OFFICIAL INTERPRETER: No, I'm not  
21 going anywhere. Holley, I just excuse myself. I'm  
22 sorry. It's -- it's not going --

23 MS. CLAIBORN: I'm going to put it on  
24 pause, please.

25 THE OFFICIAL INTERPRETER: -- this is too

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

27

1 much.

2 (Off the record)

3 MS. CLAIBORN: We're back on the record

4 after a short break.

5 Mr. Kwok, you remain under oath. During  
6 the break, I spoke with Attorney Baldiga and we have  
7 agreed that all objections as to form of the  
8 question are reserved.

9 I'm going to go back to my questions.

10 BY MS. CLAIBORN:

11 Q The question we left off after the break  
12 was what do you mean by the term family office?

13 A They are representing my big family. It's  
14 a company my son, my daughter, my wife, and it's a  
15 company representing my family for investment.

16 Q What is the name of the company?

17 A Golden Spring Europe.

18 Q Do you mean Golden Spring New York?

19 A Roughly the name.

20 Q Who pays for the meals that you eat?

21 A Sometimes my wife's company, sometimes my  
22 family office, my son's company.

23 Q Mr. Kwok, when you use the term family  
24 office, are you referring to the company known as  
25 Golden Spring New York Limited?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

28

1                   THE OFFICIAL INTERPRETER: What's the name  
2 of the company? Can I -- can you repeat it?

3                   MS. CLAIBORN: The name is Golden Spring  
4 New York Limited.

5                   THE WITNESS: Yes.

6 BY MS. CLAIBORN:

7                   Q In your bankruptcy case, you filed a  
8 report covering your expenses for the month of  
9 February.

10                  THE OFFICIAL INTERPRETER: May I repeat  
11 again?

12                  MS. CLAIBORN: Maybe I'll try it again.

13                  THE OFFICIAL INTERPRETER: Thank you.

14 BY MS. CLAIBORN:

15                  Q Mr. Kwok, you filed a monthly operating  
16 report covering the month of February 2022, and that  
17 report shows you spent approximately \$160,000.

18                  MR. BALDIGA: Objection. I object.

19 BY MS. CLAIBORN:

20                  Q Who funded the disbursements of \$160,000?

21                  A Some from the Golden Spring family office  
22 and the company, some were paid by my wife and my  
23 wife's company.

24                  Q What is the name of your wife's company?

25                  A Greenwich, in Connecticut.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

29

1 Q Are you referring to the company?

2 A Yes, the company name.

3 Q What expenses does your wife company,  
4 Greenwich, pay for?

5 A Mostly food, because I live in my wife's  
6 house. We share the cleaning, the expenses because  
7 -- and also the garden maintenance expenses.

8 UNIDENTIFIED SPEAKER: Okay. Can we take  
9 a quick time out so I can speak with my co-counsel?  
10 Or with my partner.

11 MR. BALDIGA: No, let's just wait.

12 BY MS. CLAIBORN:

13 Q Where does your wife's company, Greenwich,  
14 get its money from?

15 A I don't know.

16 Q Did your wife's company, Greenwich, pay  
17 for any professional expenses?

18 A I don't know.

19 Q Is your wife the person who actually makes  
20 the payments?

21 A Yes.

22 Q Does your wife have a checking account?

23 A I don't know.

24 Q Does your wife have a debit card?

25 A I don't know.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

30

1 Q When you eat in a restaurant with your  
2 wife, who pays the bill?

3 A I never went to a restaurant with my wife.

4 Q Ever?

5 A I think I was chased by these people and I  
6 never went. Thinks I -- you know, I think I was  
7 chased by these people.

8 Q Does your wife buy groceries?

9 A Sometimes.

10 Q How does she pay for them?

11 A I don't know.

12 Q Why does Golden Spring New York pay for  
13 some of your personal expenses?

14 A Because I'm one of the family member, and  
15 my son is very successful and he loves me very much.

16 Q Is there any other reason?

17 A I don't know.

18 Q What personal living expenses of yours  
19 does Golden Spring pay for?

20 A The expense from security because I was  
21 chased by the people in the back, and the  
22 transportation, clothing, and some items for living.

23 Q Who is the person at Golden Spring New  
24 York --

25 MS. CLAIBORN: Wait a minute. I'm going

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

31

1 to ask a full question.

2 BY MS. CLAIBORN:

3 Q So who is the person at Golden Spring New  
4 York who authorizes the payment of your personal  
5 living expenses?

6 A My son.

7 Q Please explain how your son authorizes  
8 those payments.

9 A I usually communicate with Golden Spring,  
10 the company's manager and CEO.

11 THE PRIVATE INTERPRETER: (Indiscernible)  
12 director, not manager.

13 THE OFFICIAL INTERPRETER: Could you --  
14 okay. Director, not a manager.

15 MR. BALDIGA: Thank you.

16 BY MS. CLAIBORN:

17 Q Mr. Kwok, who is the director or manager  
18 that you just referred to?

19 A Wang Yanping.

20 Q Is Ms. Ping a officer of Golden Spring New  
21 York?

22 A She is a Miss. She's a lady.

23 Q Is Ms. Ping a corporate officer of Golden  
24 Spring New York?

25 A Yes.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

32

1 Q What is her title?

2 A She is a officer or director.

3 Q Does she have a position title?

4 A I don't know.

5 Q Mr. Kwok, are you a corporate officer of  
6 Golden Spring New York?

7 A Now?

8 Q Yes.

9 A No.

10 Q Mr. Kwok, have you ever been in the past,  
11 a corporate officer of Golden Spring New York?

12 A I seem to hold a title when the company  
13 was established in 2015. I forgot what title was it  
14 then.

15 Q Mr. Kwok, do you own any interest in  
16 Golden Spring New York?

17 A No.

18 Q In the past, have you ever had any kind of  
19 ownership interest in Golden Spring New York?

20 A No.

21 Q Were you involved in the formation of  
22 Golden Spring New York?

23 A Yes.

24 Q What was your role in the formation of  
25 Golden Spring New York?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

33

1 A Consultant and giving advice, suggestions.

2 Q Was your son involved in the formation of  
3 Golden Spring New York?

4 A He is the main person. He -- he was the  
5 main person.

6 Q When Golden Spring New York was created,  
7 who had the ownership interest in New York -- Golden  
8 New -- Golden Spring New York?

9 A My son.

10 Q Did Golden Spring Hong Kong have any  
11 ownership interest in Golden Spring New York?

12 A I don't know the detail of the interest  
13 and because this -- these two combined, it's  
14 considered one thing.

15 Q Is Golden Spring Hong Kong a separate  
16 company from Golden Spring New York?

17 A I don't know.

18 Q Who owns Golden Spring Hong Kong?

19 A My son.

20 Q In 2015, when Golden Spring New York was  
21 formed, who owned Golden Spring Hong Kong?

22 A I don't know.

23 Q Are you a corporate officer of Golden  
24 Spring Hong Kong?

25 A I don't remember.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

34

1 Q Have you ever been a cooperative officer of  
2 Golden Spring Hong Kong?

3 A I don't remember.

4 Q Do you have any ownership interest in  
5 Golden Spring Hong Kong?

6 A No.

7 Q Have you ever in the past, had an  
8 ownership interest in Golden Spring Hong Kong?

9 A No.

10 Q What type of business is Golden Spring New  
11 York engaged in?

12 A I don't know.

13 Q How does Golden Spring New York generate  
14 revenue?

15 A I don't know.

16 THE PRIVATE INTERPRETER: Ms. Holley, I  
17 don't know if this -- the (indiscernible) he said,  
18 how does Golden Spring New York generate revenue,  
19 not how does Golden Spring New York making money,  
20 right?

21 MS. CLAIBORN: That was basically my  
22 question.

23 THE PRIVATE INTERPRETER: Yeah, so the  
24 interpreter should not say -- interpret it in such a  
25 way that Golden Spring New York -- how does Golden

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

35

1 Spring New York make money, to the -- to the -- to  
2 Mr. Kwok.

3 THE OFFICIAL INTERPRETER: Generate money,  
4 yeah. Generate revenue, generate money.

5 THE PRIVATE INTERPRETER: No, but you said  
6 --

7 MS. CLAIBORN: I'm happy to ask it  
8 specifically.

9 BY MS. CLAIBORN:

10 Q How does Golden Spring New York make  
11 money?

12 A I don't know.

13 Q In the year 2015, were you involved in  
14 Golden Spring New York's business?

15 A I don't remember.

16 Q Have you ever given a gift of money to  
17 Golden Spring New York?

18 A No.

19 Q Have you ever given any money to Golden  
20 Spring New York?

21 A No.

22 Q Have you ever transferred any property of  
23 any kind to Golden Spring New York?

24 A No.

25 Q Have you ever funded Golden Spring New

Ho Wan Kwok - April 6, 2022

36

1 York in any way?

2 A No.

3 Q Have you ever loaned money to Golden  
4 Spring New York?

5 A No.

6 Q Have you ever invested any of your own  
7 money in Golden Spring New York?

8 A No.

9 Q What corporate position does Yanping Wang  
10 Hold?

11 A Officer and director.

12 Q Is Yanping Wang the president of Golden  
13 Spring New York?

14 A Yes.

15 Q Does Golden Spring New York have any other  
16 corporate officers?

17 A Yes.

18 Q Who are they?

19 A I don't remember clearly about their  
20 names.

21 Q Please tell me what you remember.

22 A What -- I don't remember their names  
23 clearly and -- because I don't even remember  
24 attorney's names. I don't want to misleading you,  
25 Holley.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

37

1 Q How many officers does Golden Spring New  
2 York have?

3 A I don't remember. Oh, I don't know.  
4 Sorry. I don't know.

5 Q Does Golden Spring New York have any  
6 directors?

7 A Yanping Wang.

8 Q Is Ms. Wang the only director of Golden  
9 Spring New York?

10 A I don't know.

11 Q Where does Golden Spring New York get the  
12 money that it uses to pay your personal expenses?

13 A I don't know.

14 Q Does Golden Spring New York have any  
15 employees?

16 A Yes.

17 Q How many?

18 A I don't know.

19 Q Are you currently involved in any way in  
20 the business of Golden Spring New York?

21 A No.

22 Q What does Golden Spring New York own?

23 A I don't know.

24 Q Golden Spring New York is willing to loan  
25 you the sum of \$8 million. Where is it getting that

Ho Wan Kwok - April 6, 2022

38

1 \$8 million from?

2 A I don't know.

3 Q Are you the person who asked Golden Spring  
4 New York to loan you \$8 million?

5 A No.

6 Q Who asked Golden Spring New York to loan  
7 you \$8 million?

8 A My attorney.

9 Q Which attorney?

10 A Aaron Mitchell here.

11 Q Are you referring to Aaron Mitchell?

12 A Now I remember his name now.

13 UNIDENTIFIED SPEAKER: Just for the  
14 record, I'm not sure Mr. Mitchell has registered an  
15 appearance yet. It would be appropriate if he's  
16 going to be here representing the debtor, if he  
17 (indiscernible) his appearance.

18 MS. CLAIBORN: I believe I did read Mr.  
19 Mitchell's name earlier today.

20 UNIDENTIFIED SPEAKER: He hasn't filed --

21 MS. CLAIBORN: He did sign --

22 UNIDENTIFIED SPEAKER: -- an appearance in  
23 this matter.

24 MS. CLAIBORN: Thank you. Can you  
25 translate that?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

39

THE OFFICIAL INTERPRETER: I didn't hear  
totally clearly. I know it's some distance. I  
don't --

BY MS. CLAIBORN:

Q Does Golden Spring New York have any bank accounts?

A I don't know.

Q Do you have access to Golden Spring New  
York's financial accounts?

10 A No.

11 Q Do you have authority to enter into  
12 financial transactions on behalf of Golden Spring  
13 New York?

14 A No.

15 THE PRIVATE INTERPRETER: No. No, that's  
16 not the question.

17 THE OFFICIAL INTERPRETER: What was it?

18 MS. CLAIBORN: I'm happy to repeat the  
19 question.

20 BY MS. CLAIBORN:

21 Q Do you have authority to enter into  
22 financial transactions on behalf of Golden Spring  
23 New York? Mr. Kwok, if you don't answer -- if you  
24 don't understand my question --

25 THE OFFICIAL INTERPRETER: He's asking if

Ho Wan Kwok - April 6, 2022

40

1       he -- if I was asking if he has the right to use the  
2       -- the Golden Spring New York, the accounts for  
3       transactions. You know.

4                  MS. CLAIBORN: That was not my question.

5                  BY MS. CLAIBORN:

6                  Q       Mr. Kwok, are you authorized to enter into  
7       any kind of financial transactions on behalf of  
8       Golden Spring New York?

9                  A       No.

10                 MR. BALDIGA: Excuse me, the interpreter  
11       might have a comment.

12                 MS. CLAIBORN: Can you translate that,  
13       please?

14                 THE OFFICIAL INTERPRETER: Yeah. She said  
15       that it's the trading -- trading of the financial  
16       trading --

17                 THE PRIVATE INTERPRETER: Transaction.

18                 THE OFFICIAL INTERPRETER: -- transaction  
19       to --

20                 THE PRIVATE INTERPRETER: Not trading.

21                 THE OFFICIAL INTERPRETER: He said that,  
22       no, he was not -- I was not authorized to do the  
23       transactions, financial transactions.

24                 BY MS. CLAIBORN:

25                 Q       What, if anything, do you currently do for

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

41

1           Golden Spring New York?

2           A     No.

3           Q     Is Golden Spring New York funding your  
4           son's personal living expenses?

5           A     I don't know.

6           Q     Is Golden Spring New York funding your  
7           daughter's personal living expenses?

8           A     I don't know.

9           Q     Do you owe any money to Golden Spring New  
10          York?

11          A     Yes.

12          Q     How much?

13          A     Like more than \$21 million.

14          Q     How do you owe more than \$21 million to  
15          Golden Spring New York?

16          A     Because in the past five years and I was  
17          sued by a lot of creditors.

18          Q     Did Golden Spring New York --

19               MS. CLAIBORN: I apologize.

20               THE OFFICIAL INTERPRETER: I just ask him  
21          to repeat.

22               THE WITNESS: In the past five years, I  
23          was chased by Chinese Communist Party.

24               THE OFFICIAL INTERPRETER: I didn't get  
25          it. Ask -- I'm asking him to repeat it one more

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

42

1 time.

2 MR. BALDIGA: Short -- short answer.

3 THE WITNESS: In the past five years I was  
4 trapped -- trapped by some of the cases from Chinese  
5 Communist Party, designed by the Chinese Communist  
6 Party, including the case past, that case. I need  
7 to -- need to pay a large amount of legal fees so  
8 that's why I got the support from the Golden Spring  
9 New York. This is the main reason I owe \$21  
10 million.

11 THE PRIVATE INTERPRETER: Interpreter  
12 missed that, the legal -- legal fee.

13 THE OFFICIAL INTERPRETER: Yeah, I said  
14 the legal fee. I said that. Did I say legal fee?

15 THE PRIVATE INTERPRETER: I didn't think  
16 so, but as long as you say that.

17 BY MS. CLAIBORN:

18 Q How much of the \$21 million is comprised  
19 of legal fees?

20 THE OFFICIAL INTERPRETER: Can you repeat  
21 that one again?

22 BY MS. CLAIBORN:

23 Q How much of the \$21 million --

24 THE OFFICIAL INTERPRETER: Okay.

25 BY MS. CLAIBORN:

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

43

1 Q -- is comprised of legal fees?

2 A I think most of it is legal fee.

3 Q Why is Golden Spring New York paying your  
4 legal fees?

5 A Because the Golden Spring New York is my  
6 son and my family's company and they love me very  
7 much. They hope -- they hoping me to live, not be  
8 killed by the people behind me.

9 Q Do you have any written agreement with  
10 Golden Spring New York?

11 A Yes.

12 Q What legal -- sorry. What written  
13 agreements do you have with Golden Spring New York?

14 A It's agreement for borrowing -- borrowing  
15 money.

16 Q When did you enter into that agreement to  
17 borrow money?

18 A A few years ago. I know -- I don't know  
19 rough time.

20 THE PRIVATE INTERPRETER: I don't recall.

21 MS. CLAIBORN: What --

22 THE OFFICIAL INTERPRETER: What -- yeah, I  
23 don't remember the time.

24 BY MS. CLAIBORN:

25 Q What are the terms of the legal agreement

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

44

1       with Golden Spring New York? Sorry. Let me  
2       rephrase that. What are the terms of the written  
3       agreement with Golden Spring New York?

4           A     I don't remember.

5                   UNIDENTIFIED SPEAKER: Sorry. Could you  
6       repeat the English, please?

7                   MS. CLAIBORN: Go ahead and say that --  
8       repeat.

9                   THE OFFICIAL INTERPRETER: I don't  
10      remember.

11                  BY MS. CLAIBORN:

12                Q     Are you obligated under that written  
13       agreement with Golden Spring New York to pay back  
14       all of the money?

15                A     Yes.

16                MR. BALDIGA: There's more to the  
17       question.

18                  BY MS. CLAIBORN:

19                Q     That Golden Spring paid to lawyers on your  
20       behalf.

21                A     Yes.

22                THE PRIVATE INTERPRETER: It was only  
23       (indiscernible) of a difference in the interpreting.  
24       For example, the interpreter did not interpret under  
25       the agreement, are you obligated to make them all --

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

45

1 to pay back all the money. All the money that is,  
2 you know --

3 MR. BALDIGA: Okay.

4 THE PRIVATE INTERPRETER: -- spent on the  
5 lawyer.

6 MR. BALDIGA: Maybe Holley can clarify  
7 that.

8 THE PRIVATE INTERPRETER: Yeah.

9 BY MS. CLAIBORN:

10 Q I'm going to ask a long question. I'm  
11 going to break it into parts.

12 Mr. Kwok, are you obligated to pay back  
13 Golden Spring New York for all of the money that  
14 Golden Spring New York paid to lawyers on your  
15 behalf?

16 A Yes.

17 Q Is that agreement with Golden Spring New  
18 York in writing?

19 A Yes.

20 Q Is that the same written agreement you  
21 mentioned a few minutes ago?

22 A Yes.

23 Q Do you have more than one written  
24 agreement with Golden Spring New York?

25 A Yes.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

46

1 Q What are your other written agreements  
2 with Golden Spring New York?

3 A In the past week, I had a case with Logan  
4 Cheng. The settlement with Logan Cheng, the money  
5 from -- for the settlement is the money I borrow  
6 from Golden Spring New York.

7 Q Do you have any other written agreements  
8 with Golden Spring New York?

9 A I don't remember.

10 Q Does Golden Spring New York have a fee  
11 agreement with any of the attorneys who represent  
12 you in litigation?

13 Can you -- can you answer, Mr. Kwok?

14 THE OFFICIAL INTERPRETER: Any agreement  
15 with -- can you repeat one more time?

16 BY MS. CLAIBORN:

17 Q Does Golden Spring New York have a -- any  
18 kind of a fee agreement with any of the lawyers who  
19 represent Mr. Kwok in litigation?

20 A I don't know.

21 Q Mr. Kwok, who represents you in the  
22 litigation you filed against UBS in London?

23 A Attorney -- attorney office in London.

24 Q What is the name?

25 A I don't remember completely about the

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

47

1 English name.

2 Q Does Golden Spring New York have a fee  
3 agreement with that attorney in London?

4 A There should be.

5 MR. BALDIGA: I'm sorry. What was the  
6 answer?

7 THE OFFICIAL INTERPRETER: Should have.

8 BY MS. CLAIBORN:

9 Q Do you know if it does have enough -- have  
10 a fee agreement?

11 A I'm not sure.

12 Q Who is the person at Golden Spring New  
13 York who authorized payment of your litigation  
14 expenses?

15 A My son.

16 Q Does your son have to speak with anyone  
17 else in order to use Golden Spring New York money  
18 for your benefit?

19 A Yes.

20 Q Who does your son need to speak with?

21 A He needs to talk to my family member,  
22 which includes more than 100 family members, and  
23 that because they have a fund.

24 THE PRIVATE INTERPRETER: That -- the  
25 number is 181.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

48

1 BY MS. CLAIBORN:

2 Q Mr. Kwok, if your son wanted to give you  
3 \$100, would he have to seek authority from someone  
4 at Golden Spring New York?

5 A I don't know.

6 Q When you say your son has to speak with  
7 someone at Golden Spring New York, how many people  
8 does he need to speak with?

9 A I don't know details.

10 Q With respect to the \$8 million that Golden  
11 Spring New York is willing to loan you, did your son  
12 have to obtain consent of other people at Golden  
13 Spring New York for that transaction?

14 A I don't know.

15 Q Have you ever been to the office of Golden  
16 Spring New York in New York City?

17 A Yes.

18 Q How often do you go to the Golden Spring  
19 New York office in New York City?

20 A Not -- not fixed. Sometimes I go there a  
21 few times a month. Sometimes I haven't -- I haven't  
22 gone there for a few months.

23 Q When was the last time you went to the  
24 Golden Spring New York office?

25 A Yesterday.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

49

1 Q Why did you go?

2 A For preparing today's meeting.

3 Q Did your son speak with Yanping Wang about  
4 the \$8 million loan?

5 A I don't know.

6 Q Did you negotiate the terms of the \$8  
7 million loan from Golden Spring New York?

8 A No.

9 Q Who was the person who negotiated the \$8  
10 million loan on your behalf?

11 A My attorney.

12 Q Which attorney?

13 A Aaron Mitchell.

14 Q Who did Attorney Aaron Mitchell negotiate  
15 with at Golden Spring New York?

16 THE OFFICIAL INTERPRETER: Can you repeat  
17 one?

18 BY MS. CLAIBORN:

19 Q Who did Attorney Aaron Mitchell negotiate  
20 with at Golden Spring New York?

21 A I don't know. My son.

22 Q Did you borrow the sum of \$1 million from  
23 Lamp Capital, LLC in February 2022?

24 A Yes.

25 Q Is that loan from Lamp Capital, LLC in

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

50

1 writing?

2 A No.

3 Q What are the loan terms of the loan from  
4 Lamp Capital?

5 A I don't know detail.

6 Q Who are the members of Lamp Capital, LLC?

7 A My son.

8 Q Are there any other members of Lamp  
9 Capital, LLC?

10 A I don't know.

11 Q Who is the managing member of Lamp  
12 Capital, LLC?

13 A I don't know.

14 Q Who was the person at Lamp Capital who  
15 authorized the loan?

16 A My son.

17 Q What are the assets of Lamp Capital, LLC?

18 A I don't know.

19 Q What does Lamp Capital own?

20 A I don't know.

21 Q Have you ever funded Lamp Capital in any  
22 way?

23 A No.

24 Q Have you ever invested any money in Lamp  
25 Capital, LLC?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

51

1 A No.

2 Q Why did Lamp Capital loan you the \$1  
3 million and not Golden Spring New York?

4 A I don't know.

5 Q What is the source of the \$1 million that  
6 Lamp Capital loaned to you?

7 A I don't know.

8 MS. CLAIBORN: Why don't we take a five-  
9 minute break for the restroom? We'll reconvene  
10 actually, at 12:10.

11 (Recess)

12 MS. CLAIBORN: We are back on the record  
13 after a short break.

14 Mr. Kwok, you remain under oath.

15 BY MS. CLAIBORN:

16 Q Mr. Kwok, were you involved in the  
17 selection of the lawyers who represent you in your  
18 action in London?

19 A Yes.

20 Q Did your counsel in London request a  
21 retainer?

22 A Yes.

23 Q And did you pay your counsel in London a  
24 retainer?

25 A Yes.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

52

1 Q How much?

2 A 300,000 pound.

3 Q And when was that 300,000 pound retainer  
4 paid?

5 A Roughly two years ago.

6 Q Who funded the retainer?

7 A My son helped to pay -- pay that.

8 Q Did your son pay all of the retainer?

9 A Yes.

10 Q Did your son pay the retainer out of his  
11 personal funds?

12 A Should be from the company, England.

13 Q What was the name of the company who paid  
14 the retainer?

15 A I don't remember.

16 Q Did Golden Spring New York pay the  
17 retainer to your London counsel?

18 A I don't remember details because other  
19 than the retainer and the other -- a few more  
20 payments in -- you know, after.

21 Q Mr. Kwok, if you wanted to go buy a pair  
22 of shoes, how would you pay for a pair of shoes?

23 A I will ask Golden Spring New York to pay  
24 for it.

25 Q And how would that process work?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

53

1 A And I will talk to the director and E Wa  
2 Wang (ph) and ask her to contact -- talk to my son  
3 and to pay for the shoes.

4 Q How does the shoe company get the money?  
5 The shoe store.

6 A I don't know. Usually, it's E Wa Wang and  
7 communicate, because my English ability is not  
8 capable to communicate.

9 Q If you went to a store, tried on shoes,  
10 and wanted to take them home from the store, how  
11 would you pay for the shoes?

12 A In the recent few years I basically never  
13 bought a pair of shoes.

14 Q What was the last thing you paid for?

15 A Recently, I didn't go to buy anything.

16 MR. BALDIGA: I'm sorry. Could you repeat  
17 that?

18 THE OFFICIAL INTERPRETER: Recently, I  
19 didn't go to buy anything.

20 BY MS. CLAIBORN:

21 Q My question wasn't recently. My question  
22 was, what was the last thing that you purchased?

23 A I don't remember.

24 Q Do you ever eat in a restaurant?

25 A Recent years, I didn't.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

54

1 Q Before COVID 19, did you eat in  
2 restaurants?

3 A Very rare because I was afraid to be  
4 killed by the people behind me, because I was always  
5 in the process getting chased.

6 Q When you ate in a restaurant, were you the  
7 person who paid the bill?

8 A I don't have money to pay, so that's why I  
9 don't go there.

10 Q Mr. Kwok, if you wanted to go buy a cup of  
11 coffee, how would you pay for it?

12 A I never bought a cup of coffee. I was --  
13 I'm afraid the people behind me might poison me in  
14 the coffee.

15 Q Mr. Kwok, if you wanted to buy water,  
16 you're out and about and you want to buy water, how  
17 would you pay for it?

18 A Well, since 2017, I don't -- I didn't go  
19 out to buy water outside.

20 THE PRIVATE INTERPRETER: There was a  
21 (indiscernible) difference in the nuance.

22 THE OFFICIAL INTERPRETER: Can you -- can  
23 you repeat it -- can you repeat --

24 THE WITNESS: Since 2017, I never went  
25 outside, walk around, and then buy water or coffee.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

55

1 BY MS. CLAIBORN:

2 Q Mr. Kwok, do you have any interest in any  
3 mutual funds?

4 A No.

5 Q Do you own any bonds?

6 A No.

7 Q Do you own any publically traded stock in  
8 any company?

9 A No.

10 Q Do you own any cars?

11 A No.

12 Q Do you have access to any cars?

13 A Yes.

14 Q And whose cars do you have access to?

15 A My son's and Golden Springs.

16 Q Does Golden Spring provide you with a car  
17 that's yours to use?

18 A Yes.

19 Q What kind of car is that?

20 A Maybach

21 THE PRIVATE INTERPRETER: Maybach.

22 THE OFFICIAL INTERPRETER: Huh?

23 THE PRIVATE INTERPRETER: Maybach.

24 THE OFFICIAL INTERPRETER: Maybach? Okay.

25 I don't know the name of it.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

56

1 THE WITNESS: Maybach.

2 BY MS. CLAIBORN:

3 Q Mr. Kwok, do you have a driver's license?

4 A I have a Hong Kong's driver's license.

5 Q Do you drive in the United States?

6 A Almost no.

7 Q When you do drive, whose car do you drive?

8 A Golden Spring's.

9 Q Do you keep a car at your Greenwich  
10 residence?

11 A Yes.

12 Q And what car is that?

13 A Maybach.

14 Q Do you own any aircraft?

15 A No.

16 Q Have you ever owned any aircraft?

17 A Before, yes.

18 Q When did you own aircraft?

19 A Probably 2010 to 2016.

20 Q How many air craft did you own?

21 A One.

22 Q And what was it?

23 A Airbus 319. 319.

24 Q And what happened to the Airbus 319?

25 A It was confiscated by UBS and the Chinese

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

57

1 Communist Party.

2 Q Okay. Do you own any water craft?

3 A No.

4 Q Who owns the yacht known as the Lady May?

5 A My daughter.

6 Q Does your daughter own the Lady May in her  
7 personal name?

8 A Should be from a company.

9 Q And what is the name of the company that  
10 owns the Lady May?

11 A I don't know.

12 Q Where is the Lady May currently?

13 A I don't know.

14 Q Since the bankruptcy filing, have you  
15 asked your daughter to return the Lady May to New  
16 York?

17 A I did ask her and asked her to talk to her  
18 attorney to return the boat back to New York.

19 Q When did you have that conversation?

20 A Last month, after the court date. After  
21 met with you.

22 Q And what did your daughter say?

23 A She said that she would talk to her  
24 attorney and then talk to my attorney.

25 Q Did your daughter agree to have the Lady

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

58

1 May return to New York?

2 A She was not willing to talk to me in any  
3 detail. She want -- she wanted to talk to her  
4 attorney.

5 Q Did your daughter say no to your request  
6 that she return the Lady May to New York?

7 A No, he didn't -- she didn't.

8 THE PRIVATE INTERPRETER: The question was  
9 not completely interpreted.

10 THE OFFICIAL INTERPRETER: I know, but she  
11 -- she already -- he already answered and --

12 MR. BALDIGA: Wait until he finishes.

13 THE WITNESS: No, he -- no.

14 BY MS. CLAIBORN:

15 Q Mr. Kwok, do you own or have an interest  
16 in any trust?

17 A No.

18 Q Are you the beneficiary of any trusts?

19 A No.

20 Q This is a long question. Mr. Kwok, where  
21 is the \$12,000 check paid to you in connection with  
22 your lawsuit against Baosheng Guo?

23 A It's in attorney's escrow account.

24 Q What is the name of the attorney who is  
25 holding the check?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

59

1 A I can't pronounce the attorney's name  
2 completely.

3 Q What is the attorney's first name?

4 A I cannot -- I'm not able to read out the -  
5 - the pronounce his name.

6 Q Is the attorney who's holding the check  
7 the same attorney who represented you in that  
8 lawsuit?

9 A It should be.

10 Q On your Schedule A-B, you did not disclose  
11 that \$12,000 check. Why?

12 MR. BALDIGA: Wait for a question. No.  
13 Could he interpret that?

14 BY MS. CLAIBORN:

15 Q Why did you not disclose that \$12,000  
16 check?

17 A My attorney thinks because the money is  
18 not in my account, so I'm not allowed to -- we're  
19 not -- I'm not supposed to disclose that.

20 Q Okay. Mr. Kwok, do you have any patents?

21 A No.

22 Q Do you have any copyrights?

23 A No.

24 Q Do you have any intellectual property of  
25 any kind?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

60

1 A No.

2 MR. BALDIGA: Excuse me. Holley, I'm not  
3 sure if you're going to come back to it, but there  
4 is a reference to the \$12,000.

5 MS. CLAIBORN: I did see that.

6 MR. BALDIGA: Oh, you said he didn't  
7 disclose it.

8 MS. CLAIBORN: He did not. It's not in  
9 response to the questions on Schedule A-B.

10 MR. BALDIGA: It's right there.

11 MS. CLAIBORN: We can disagree about  
12 whether or not it's disclosed, but it's my position  
13 that it's not disclosed. I understand you might  
14 take a different position.

15 BY MS. CLAIBORN:

16 Q Mr. Kwok, do you own any interest in a  
17 company called Ace Decade Holdings Limited?

18 A Yes.

19 Q What is the nature of your ownership  
20 interest in Ace Decade Holdings Limited?

21 A So I have the interest and ask for UBS to  
22 pay back \$500 million. That kind of interest.

23 Q Are you the only legal owner of Ace Decade  
24 Holdings Limited?

25 THE OFFICIAL INTERPRETER: Are you the

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

61

1 only -- can you repeat that question?

2 BY MS. CLAIBORN:

3 Q Are you the only legal owner of Ace  
4 Decades?

5 A I am a legal representing owner.

6 Q Are there any other owners of Ace Decade?

7 A No.

8 Q When did you become an owner of Ace Decade  
9 Holdings Limited?

10 A At the end of 2014.

11 Q This is a long question. In your  
12 litigation in London against UBS, you are an  
13 individual plaintiff. What is the basis for your  
14 claim as an individual plaintiff?

15 A Because I'm the 100 percent representative  
16 for Ace Decade.

17 Q In the litigation against UBS in London,  
18 there is an allegation that Ace Decade gave \$500  
19 million to Dawn State Limited. Where did Ace Decade  
20 get the \$500 million?

21 A I loan from my family.

22 Q Did you borrow money from your family and  
23 give it to Ace Decade?

24 A Yes.

25 MS. CLAIBORN: I don't think that was --

Ho Wan Kwok - April 6, 2022

62

1 let's start over, because I don't think that was --  
2 that was --

3 THE PRIVATE INTERPRETER: Yeah, I thought  
4 that it was --

5 MS. CLAIBORN: -- that was the question,  
6 because it didn't involve Dawn State --

7 THE PRIVATE INTERPRETER: Yes.

8 MS. CLAIBORN: -- so I'm going to start  
9 over.

10 BY MS. CLAIBORN:

11 Q Where did you get the money to give to Ace  
12 Decade, the 500 million?

13 MR. BALDIGA: I don't think he said he did  
14 that. I think he said his family did that, but you  
15 can ask that, but I --

16 THE WITNESS: From my family.

17 BY MS. CLAIBORN:

18 Q Who specifically in your family gave you  
19 money that you then gave to Ace Decade?

20 A John Way (ph).

21 Q Who is John Way?

22 A A member from my family.

23 Q Is he a relative of yours?

24 A It's my older brother's cousin or --

25 THE PRIVATE INTERPRETER: Son-in-law.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

63

1 THE OFFICIAL INTERPRETER: Son-in-law?

2 Okay. Sorry.

3 BY MS. CLAIBORN:

4 Q On your Schedule A-B, you list a possible  
5 malpractice claim against Boise Schiller. Can you  
6 please explain what that is?7 A He was the one -- he was the one  
8 represented me in New York to have a lawsuit against  
9 UBS. He gave a lot of forced documents to the Court  
10 and without my permission. He also threatened my  
11 family. He also threaten myself after drinking. He  
12 brought a lot of loss to us, including providing any  
13 English/Chinese translated documents to me before  
14 present them to the -- to the lawyer, or to the  
15 judge. That's why I -- that's why we sue him.16 Q Have you hired an attorney to represent  
17 you in that malpractice action?18 A My son is in the process of dealing with  
19 that.20 Q Why is your son talking to lawyers about  
21 your malpractice claim?

22 A Because I need to borrow money from him.

23 Q Has a lawyer been selected?

24 A Not yet.

25 Q Mr. Kwok, do you own an interest in any

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

64

1 company aside from Ace Decade?

2 A No, but the -- I own the Bravo Luck, the  
3 apartment, only for a few months, some of the  
4 interest. And because the apartment is a co-op, so  
5 they used my name to buy the apartment after I --  
6 after we bought apartment, and then we returned the  
7 stock interest back.

8 UNIDENTIFIED SPEAKER: I'm sorry. He must  
9 have spoken for 30, 40 seconds. Clearly said more  
10 than that. Is there a more fulsome translation?

11 THE OFFICIAL INTERPRETER: Did I miss  
12 anything?

13 MS. CLAIBORN: Let me see if I can follow  
14 up.

15 BY MS. CLAIBORN:

16 Q Mr. Kwok, do you own, currently, an  
17 interest in Bravo Luck?

18 A No.

19 Q Mr. Kwok, do you own an interest in any  
20 limited liability company?

21 A No.

22 Q Mr. Kwok, do you own an interest in any  
23 partnership?

24 A I used to own the plane company called the  
25 Orange or Shiny Time, but that was before and

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

65

1 doesn't exist anymore.

2 Q Mr. Kwok, do you currently own an interest  
3 in any partnership?

4 A No.

5 Q Mr. Kwok, do you currently own an interest  
6 in any joint venture?

7 A No.

8 Q Other than Ace Decade, do you own an  
9 interest in any other company right now?

10 A No. I only owned the Orange and Shiny  
11 Time before, but not right now.

12 Q Does Golden Spring New York have a  
13 security interest in any of your litigation?

14 A I owe them money.

15 Q Have you granted to Golden Spring New  
16 York, any interest in any of your assets, anything  
17 that you own?

18 A No.

19 Q So if you were to win a lawsuit against  
20 Golden Spring -- sorry. Wrong name. So if you were  
21 to win a lawsuit against UBS, would any of the money  
22 that you win have to be paid to Golden Spring?

23 A Yes.

24 Q And how much would that be?

25 A Before it was 2,200 1 million, or --

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

66

1 THE PRIVATE INTERPRETER: 21 million.

2 THE WITNESS: 21 million. 21 million and  
3 plus now. Probably it's about 300 million. 30  
4 million. Or 30 million. Yeah.

5 BY MS. CLAIBORN:

6 Q Is there a document that says that any  
7 litigation winnings you receive need to be paid to  
8 Golden Spring?

9 A Yes.

10 Q What is the name of that document?

11 THE OFFICIAL INTERPRETER: I'm going to  
12 ask him to repeat it.

13 I didn't get it. I just ask him to break  
14 it down, then I didn't hear what --

15 THE WITNESS: I have a case in DC. There  
16 is a attorney office representing me for political  
17 asylum and it was attacked by the cyber attack from  
18 the Chinese Communists, and so they -- the attorney  
19 office was closed, and they gave my personal  
20 information to the communist party, and then I sue  
21 them. And that litigation fee, attorney fee, came  
22 from Golden Spring New York.

23 I ask for the settlement for 50,000 -- \$50  
24 million. If I won that money, I will give the money  
25 back to Golden Springs for the money they supported

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

67

1 me for attorney fees.

2 THE PRIVATE INTERPRETER: Mr. Kwok did not  
3 say settlement. Mr. Kwok just say, for a claim, not  
4 a settlement.

5 THE OFFICIAL INTERPRETER: You're asking  
6 for \$50 million. Yeah. He ask for \$50 million for  
7 that lawsuit, and if he win -- if he wins the money,  
8 then he will return the money back to the Golden  
9 Spring New York.

10 BY MS. CLAIBORN:

11 Q My question was, what was the name of the  
12 document under which you would be repaying Golden  
13 Spring for your litigation?

14 A The document is the document I --

15 THE OFFICIAL INTERPRETER: Can you repeat  
16 that one?

17 THE WITNESS: The agreement is -- it's the  
18 agreement, I borrowed the money from Golden Spring  
19 New York to sue the attorney office.

20 BY MS. CLAIBORN:

21 Q And what is the name of the agreement?

22 A I don't remember.

23 Q Is it a promissory note?

24 A I don't remember.

25 Q Is it a contract?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

68

1 A I don't remember clearly.

2 Q Who prepared the document?

3 A Attorney.

4 Q What was the name of the attorney who  
5 prepared the document?

6 A Melissa.

7 Q What is Melissa's last name?

8 A I don't know.

9 Q Did Melissa the attorney represent you in  
10 drafting that document?

11 A Yes.

12 Q And who represented Golden Spring in  
13 drafting that document?

14 A I don't know.

15 Q Did Golden Spring have any attorney?

16 A Yes.

17 Q You just don't remember who it was?

18 A They have a lot of attorneys.

19 Q Is there more than one written agreement  
20 under which you owe money to Golden Spring New York?

21 A Yes.

22 Q How many agreements are there?

23 A Kind of two or three, or three or four. I  
24 don't remember clearly.

25 Q And does someone keep track of the money

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

69

1 that you borrow from Golden Spring New York?

2 A My attorney will write it down. We record  
3 it.

4 Q What's the name of that attorney?

5 A Aaron Mitchell.

6 Q Did you say Aaron Mitchell?

7 A Oh, yes.

8 Q And how does Aaron Mitchell keep track of  
9 the monies that you borrow from Golden Spring New  
10 York?

11 A In detail, I don't know.

12 Q Does anyone who is employed by Golden  
13 Spring New York keep track of the money that you  
14 borrow from Golden Spring New York?

15 A I don't know.

16 Q Have you ever seen a document from  
17 Attorney Aaron Mitchell showing how much you owe to  
18 Golden Spring New York?

19 A This is the thing I -- it's something  
20 between me and my attorney I shouldn't answer.

21 MR. BALDIGA: Can I -- I mean --

22 MS. CLAIBORN: I don't think the question  
23 involves --

24 MR. BALDIGA: You can --

25 MS. CLAIBORN: -- a privileged answer.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

70

1 MR. BALDIGA: That's -- give me a second.  
2 You could answer that last question yes or no, so if  
3 you ask again, I think he will say yes or no, and  
4 then we can take it step by step.

5 BY MS. CLAIBORN:

6 Q Have you ever seen a document prepared by  
7 Attorney Mitchell that shows you how much money you  
8 have borrowed from Golden Spring?

9 MR. BALDIGA: Wait. Wait, my instruction  
10 needs to be interpreted.

11 THE OFFICIAL INTERPRETER: What?

12 MS. CLAIBORN: Can you --

13 MR. BALDIGA: You need to instruct --

14 MS. CLAIBORN: Just please state it and  
15 he'll reinterpret.

16 MR. BALDIGA: Please, tell the witness  
17 what -- I am telling the witness he may answer yes  
18 or no only.

19 THE WITNESS: Yes.

20 MS. CLAIBORN: I have other questions, but  
21 given the hour of the day, I thought that we could  
22 take a short break and then reconvene with creditors  
23 being given the opportunity to ask questions.

24 I suggest we reconvene at 1:15.

25 MR. BALDIGA: Is that okay?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

71

1 MS. CLAIBORN: Okay. Thank you. We'll  
2 reconvene at 1:15.

3 (Recess.)

4 MS. CLAIBORN: The recording has been  
5 reconvened. We are back in session after a short  
6 break and Mr. Kwok, you remain under oath.

7 And that this point, Mr. Wolman has some  
8 questions for you, Mr. Kwok.

9 EXAMINATION BY MR. WOLMAN:

10 Q Good afternoon, Mr. Kwok.

11 On March 21st I was asking you some  
12 questions about a prior deposition, specifically  
13 about the times you had invoked your rights under  
14 the Fifth Amendment of the U.S. Constitution.

15 On April 1st, 2021, were you being  
16 investigated for any crime?

17 THE OFFICIAL INTERPRETER: April 21st?

18 MR. WOLMAN: April 1st, 2021.

19 THE OFFICIAL INTERPRETER: Can you repeat  
20 that question, sir?

21 Q Were you being investigated for any crime?

22 A From SET -- American SET and the  
23 investigating GTV and they can communicate with our  
24 attorney.

25 Q Are you referring to the Securities and

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

72

1 Exchange Commission?

2 A Yes.

3 Q And what exactly were they investigating?

4 MR. BALDIGA: Objection.

5 I need to ask whether this would reveal  
6 privileged information.

7 Would your answer to the last question be  
8 information from your attorneys?

9 THE PRIVATE INTERPRETER: Can I just --

10 THE OFFICIAL INTERPRETER: She wants to  
11 help.

12 THE PRIVATE INTERPRETER: Because he's not  
13 --

14 MS. CLAIBORN: I think you should just try  
15 again. Mr. Baldiga, maybe you can just repeat  
16 yourself and Mr. Jack, you can try again.

17 THE OFFICIAL INTERPRETER: Can you repeat  
18 what you want to say?

19 MR. BALDIGA: Mr. Wolman asked you what  
20 you were being investigated for. Is the information  
21 that you know, was that provided to you by your  
22 attorneys?

23 THE WITNESS: Yes.

24 MR. BALDIGA: And to answer the question  
25 would you have to divulge what you were told by your

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

73

1 attorneys?

2 THE OFFICIAL INTERPRETER: Have to be what?  
3 Divulged?

4 MR. BALDIGA: Would you have to say what  
5 you were told by your attorneys?

6 THE WITNESS: Yes.

7 MR. BALDIGA: Then I instruct the witness  
8 not to answer on the basis of the attorney/client  
9 privilege.

10 MR. WOLMAN: That is not attorney/client  
11 information.

12 MR. BALDIGA: Hold on. Let it be  
13 interpreted.

14 MR. WOLMAN: Information learned from an  
15 attorney that is not specifically a communication  
16 for the purpose of giving advice or receiving  
17 information is not privileged information. If your  
18 attorneys says the sky is blue, that is not a  
19 privileged communication.

20 MR. BALDIGA: His is arguing with me.

21 There is not question to you.

22 MR. WOLMAN: Mr. Baldiga, will you  
23 continue to instruct your client to improperly  
24 invoke the attorney/client privilege?

25 MR. BALDIGA: I'll instruct on a question

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

74

1 by question basis.

2 MR. WOLMAN: And this question, will you  
3 maintain the instruction?

4 Mr. Kwok, are you refusing to answer my  
5 question?

6 THE WITNESS: Yes.

7 MR. WOLMAN: And on what basis are you  
8 refusing to answer my question?

9 MR. BALDIGA: On the basis of instruction  
10 from counsel on account of attorney/client  
11 privilege.

12 THE WITNESS: Because I can't answer the  
13 question because of the privilege between the  
14 attorney and me.

15 BY MR. WOLMAN:

16 Q Have you been formally charged by the  
17 Securities and Exchange Commission?

18 A No.

19 Q Has the Securities and Exchange Commission  
20 closed its investigation of you?

21 MR. BALDIGA: I have to ask again, you can  
22 answer that yes or no, if you know.

23 A No.

24 Q Has the Securities and Exchange Commission  
25 brought any charges against GTV?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

75

1 A I don't know.

2 Q Have you been in the past five years  
3 subject to an audit by the U.S. Internal Revenue  
4 Service?

5 A No.

6 Q In the last five years have you been  
7 subject to an audit by the New York State taxing  
8 authority?

9 A No.

10 Q When did you become a resident of  
11 Connecticut? On what date?

12 A The beginning of March, 2020, roughly.

13 Q To be clear, you say you were a resident  
14 of Connecticut in March of 2020?

15 A Yes.

16 Q So how come in Mr. Cheng, my client's,  
17 lawsuit against you you signed a statement under  
18 oath indicating that you were a resident of the  
19 Sherry Netherlands Hotel?

20 THE OFFICIAL INTERPRETER: Can you repeat  
21 that, counsel?

22 Q If you were a resident of Connecticut in  
23 March of 2020, you signed a statement under oath in  
24 Mr. Cheng's lawsuit against you that you resided at  
25 the Sherry Netherlands Hotel.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

76

1 A I don't 100 percent live in Connecticut,  
2 but sometimes I live in New York also.

3 Q When did you start living in Connecticut  
4 more than 50 percent of the time?

5 A Since March, 2020.

6 Q You had some assets you claim seized by  
7 China, correct?

8 A It's not mine. It's from my family. It's  
9 my family's.

10 Q Have you ever had assets seized by China?

11 A You're talking about under my name?

12 Q Yes.

13 A No.

14 Q All right. In 2010, what was your  
15 personal net worth?

16 A No.

17 Q That wasn't a yes or no question.

18 THE OFFICIAL INTERPRETER: Can I repeat  
19 your question again?

20 MR. WOLMAN: Yes.

21 Q In 2010 what was your personal net worth?

22 A I didn't have any property.

23 Q Have you ever had property in your name  
24 over \$1 million and by that I include where you  
25 owned an interest in a company that interest,

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

77

1 therefore, contributes to your work?

2 A Before 2000, yes.

3 Q Okay. What was your net worth in 1999?

4 A I never calculate in detail.

5 Q What would you estimate it as?

6 A Roughly around 100 million.

7 Q And what happened to that \$100 million  
8 worth of assets?

9 A Because in 2000 I got a Hong Kong passport  
10 and in China and they don't allow me to have any  
11 property, asset.

12 Q Have you abandoned all claims to whatever  
13 assets you had in 1999?

14 A Yes.

15 Q Why have you abandoned your claims?

16 THE OFFICIAL INTERPRETER: Abandoned what?

17 Q Your claim to those assets?

18 A Because I was not allowed to have any  
19 assets in China.

20 Q If China changed its policy, would you  
21 have any right or ability to get those assets back?

22 MR. BALDIGA: Objection. If you know, you  
23 can answer.

24 A I don't know.

25 Q What was your largest asset in 1999?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

78

1 A There was the assets from a hotel, equity  
2 interest of a hotel in China.

3 Q And who holds that interest now?

4 A Chinese Community Party.

5 Q Is it held in the name of the Party?

6 A China only has one autocrat government,  
7 the party, and our family's assets were taken --  
8 were seized by them.

9 Q How did your son become wealthy enough to  
10 fund Golden Spring and Lamp Capital?

11 A Because he started very early to do  
12 investment and also bring brand names to China.

13 Q Where did he get the money for his  
14 investment?

15 A I don't know.

16 Q Ms. Claiborn asked you about agreements  
17 with Golden Spring and you could not identify who  
18 the lawyer was for Golden Spring. Do you remember  
19 that?

20 A True.

21 Q I'd like to try to refresh -- to ask you  
22 potentially to refresh your memory was it a lawyer  
23 named Daniel?

24 THE OFFICIAL INTERPRETER: He's asking  
25 Daniel?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

79

1 Q Yes, Daniel Pedolsky.

2 A Yes, probably and he used to be Golden  
3 Spring attorney and my personal attorney.

4 Q Did you execute a waiver of conflict of  
5 interest with Mr. Pedolsky?

6 THE OFFICIAL INTERPRETER: Can you repeat  
7 that?

8 Q Did you execute a waiver of conflict of  
9 interest with Attorney Daniel Pedolsky?

10 A I don't remember.

11 Q You mentioned two or three -- or three or  
12 four agreements with Golden Spring. Can you identify  
13 each of those agreements?

14 A I'm not sure.

15 Q Can you describe the purpose of each of  
16 those agreements?

17 A That loan from Golden Spring is to have a  
18 settlement with Logan Cheng.

19 Q And did you take out a loan to pay the  
20 lawyers to sue Logan Cheng?

21 A I don't remember.

22 Q And what were the other agreements, other  
23 than with Mr. Cheng?

24 A From D.C. -- the attorney's office from  
25 D.C. collect (indiscernible) I don't remember the

Ho Wan Kwok - April 6, 2022

80

1 name.

2 MR. WOLMAN: All right. Thank you and  
3 this time I have to go but thank you. I'll try to  
4 dial in.

5 MS. CLAIBORN: Thank you.

6 Can I ask whoever is on the line if they  
7 could mute themselves, because they can hear you  
8 typing.

9 All right. Who else would like to ask  
10 questions?

11 Mr. Harbach. Go ahead, Mr. Harbach.

12 MR. HARBACH: Thank you. For the record,  
13 I'm David Harbach with O'Melveny and Meyers and I  
14 represent PAACS.

15 EXAMINATION BY MR. HARBACH:

16 Q Mr. Kwok, I'd like to ask some clarifying  
17 questions based on questions that Ms. Claiborn asked  
18 you today.

19 Earlier today she asked you if you owned  
20 any foreign currency and you said no. She also  
21 asked you if you owned any digital currency and you  
22 said no.

23 My question is have you ever ordered or  
24 directed the purchase of either foreign currency or  
25 digital currency on behalf of any entity?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

81

1 THE OFFICIAL INTERPRETER: Can you repeat  
2 that?

3 MR. HARBACH: Sure.

4 Q My question is whether you have ordered or  
5 directed the purchase of any foreign currency or any  
6 digital currency on behalf of any entity?

7 A What you mean direct?

8 Q Have you directed anyone to purchase  
9 foreign currency or digital currency?

10 A No.

11 Q Ms. Claiborn asked you a couple of  
12 questions about access to credit cards and debit  
13 cards. And I want to make sure that we have your  
14 answer clear, because she asked you not whether you  
15 had any credit cards but whether you had any access  
16 to credit cards. I want to make sure that you  
17 understand the difference.

18 THE OFFICIAL INTERPRETER: He's just asking  
19 why you want to represent Ms. Holley's asked  
20 questions.

21 MR. HARBACH: I'm just trying to remind  
22 you of a question she asked you earlier today, sir.

23 THE PRIVATE INTERPRETER: I don't  
24 understand the question.

25 MR. BALDIGA: Mr. Baldiga's right.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

82

1 There's not a question pending.

2 Q The question is do you understand the  
3 difference between having a credit card and having  
4 access to a credit card?

5 A I believe I don't have.

6 Q You don't understand the difference?

7 A I don't know much.

8 Q Okay. Well, let me give you an example.

9 Let's talk about the Maybach.

10 I believe that you represented to us today  
11 that you have access to the Maybach for  
12 transportation. Is that correct?

13 A Yes.

14 Q But I believe it's also your position that  
15 you do not own the Maybach. Isn't that right?

16 A Yes.

17 Q In other words, your position is the  
18 Maybach is not yours, right?

19 A Yes.

20 Q Okay. So I use that example to illustrate  
21 the example between owning something and having  
22 access to something. Does that help you? Do you  
23 understand the difference?

24 A Now I understand you.

25 Q Okay. Thank you. So returning to the

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

83

1 question about credit cards and debit cards. Do you  
2 have access to any credit cards or debit cards,  
3 whether or not they are yours?

4 A I don't understand the difference what he  
5 means, access like if I use it myself or if I have  
6 somebody else use it.

7 Q Well, let's take those one at a time.  
8 Let's begin with using it yourself. Has any member  
9 of your family ever provided you a credit card or a  
10 credit card number to use for yourself?

11 A I never used.

12 Q The other example you mentioned was  
13 perhaps a member of your family using a credit card  
14 on your behalf. Is that something that has  
15 happened?

16 A What do you mean represent me to use?

17 Q I'm asking about whether to your knowledge  
18 any member of your family has ever used a credit  
19 card or a debit card to purchase things for you?

20 A My son, my daughter, my wife. They all  
21 have credit card to buy things for me.

22 THE PRIVATE INTERPRETER: The witness did  
23 not say that, use the credit card to buy things for  
24 me. The witness said that my son, my wife bought  
25 things for me.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

84

1                   THE OFFICIAL INTERPRETER: Yeah, they used  
2 their card and they both -- they all have it. They  
3 all have the cards. That's what he said.

4                   (Repeats interpretation)

5                   THE OFFICIAL INTERPRETER: Yes, I did it  
6 right.

7                   THE WITNESS: And so my wife and my son  
8 and my daughter have their own cards and also other  
9 family members use their cards to buy things for me.

10                  Q     Is that ever at your direction?

11                  A     No.

12                  Q     Never.

13                  A     No.

14                  Q     Is it at your request?

15                  A     No.

16                  Q     Is Yan Ping Wang, the same as Yvette Wang?

17                  A     Yes.

18                  Q     Earlier Ms. Claiborn asked you about  
19 Golden Spring Hong Kong.

20                  You told her that your son owns it. Do  
21 you recall that?

22                  A     Yes.

23                  Q     My question for you is since when has your  
24 son owned Golden Spring Hong Kong?

25                  A     I don't know.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

85

1 Q Has anyone else besides your son ever  
2 owned an interest in Golden Spring Hong Kong?

3 A I don't remember.

4 Q You also said that you didn't remember  
5 whether you were ever a corporate officer of Golden  
6 Spring Hong Kong?

7 THE OFFICIAL INTERPRETER: Can you repeat  
8 that one?

9 Q You also said that you did not remember  
10 whether you were ever a corpora officer of Golden  
11 Spring Hong Kong? Does that mean that it is  
12 possible that you were and you're just not certain?

13 A I don't remember.

14 Q Ms. Claiborn asked you in a few different  
15 ways about whether you know how Golden Spring New  
16 York is funded or makes money.

17 Since when has Golden Spring been paying  
18 your personal living expenses?

19 A 2015.

20 Q So six or seven years approximately?

21 A Since 2015 and that there was a person  
22 called Bruno Wu from Mainland China and called my  
23 family, my son, daughter and wife and so since then  
24 I start spending money coming from Golden Spring New  
25 York.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

86

1                   THE PRIVATE INTERPRETER: I don't think  
2 the witness says some.

3                   THE OFFICIAL INTERPRETER: What?

4                   THE PRIVATE INTERPRETER: I don't think  
5 the witness said some.

6                   THE WITNESS: Not including the son that  
7 they caught, my wife and daughter and a lot of my  
8 family members, but not my son.

9                   Q     So approximately six or seven years that  
10 Golden Spring has been paying your personal  
11 expenses. Is that right?

12                  A     Yes.

13                  Q     During those six or seven years did you  
14 never discuss with any of your family members where  
15 the money was coming from?

16                  A     Because a lot of my family members were  
17 caught by -- were arrested by your client, Bruno Wu,  
18 and so I have no communication. I cannot communicate  
19 with him.

20                  THE PRIVATE INTERPRETER: Not exactly. The  
21 partner of PAACS -- the partner who the counsel was  
22 represented, PAACS -- partner of PAACS --

23                  THE OFFICIAL INTERPRETER: I don't know.  
24 He didn't mention anything about PAACS.

25                  THE WITNESS: So it's the other attorney

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

87

1 representing the client, Bruno Wu, arrested a lot of  
2 your family members. Your client's past partner,  
3 one of the partners, (indiscernible) Bruno Wu and  
4 arrested a lot of your family members so you can't  
5 communicate with them.

6 Q At any time since 2015 have you been in  
7 communication with your daughter, or your wife, or  
8 your son?

9 A Yes.

10 Q At any time that you've been in  
11 communication with any of those three individuals  
12 did you ever ask them about where Golden Spring's  
13 money was coming from?

14 A Yes, I asked.

15 Q And who did you ask?

16 A I asked all three of them.

17 Q And what did they say?

18 A They told me because I was in the position  
19 of being chased so don't ask our own financial  
20 information. Don't ask me for anything and we will  
21 help you to -- we will help you as much as we can.

22 Q When was that?

23 A After 2017.

24 Q How long after 2017?

25 A I don't remember.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

88

1           Q     And when you had this conversation with  
2     your family were the three of them together or where  
3     these separate conversations?

4           A     Separate.

5           Q     And each of the three of them said more or  
6     less the same thing?

7           A     Similar.

8           Q     So I want to make sure I have this  
9     correct. You asked each of them where Golden  
10    Springs money was coming from and each of them said  
11    to you don't ask me about that because -- finish the  
12    sentence for me.

13          A     So you are making a story I don't  
14    understand.

15          Q     I'm trying to ask you to help me  
16    understand. I'm trying to understand the reason why  
17    your family members told you not to ask why your  
18    family members told you not to ask about where  
19    Golden Spring got the money.

20           MR. BALDIGA: Let him ask you a question.

21          Q     Please tell me why each of your family  
22    members told you not to ask them about where Golden  
23    Spring money came from?

24           MR. BALDIGA: Objection. If you know.

25           THE OFFICIAL INTERPRETER: You're asking

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

89

1 to object the question?

2 MR. BALDIGA: I objected.

3 THE OFFICIAL INTERPRETER: Oh, you  
4 objected.5 MR. BALDIGA: I permit him to answer if he  
6 knows.

7 THE OFFICIAL INTERPRETER: Okay.

8 THE WITNESS: My daughter and wife were  
9 arrested by his partner and got released 2017 and  
10 released to New York. They were tortured  
11 tremendously by communist party. The person  
12 tortured them is this attorney's partner. They all  
13 have their own attorneys. They told me don't ask me  
14 or communicate with me about their own financial and  
15 personal information. Anything you want to do it's  
16 better go through attorneys.17 This is the doctrine, the thing, my family  
18 members told them before they came to New York. I  
19 just want to tell you it's the meaning, very similar  
20 meanings, but I can't tell you word by word.21 So I don't want this counsel make any  
22 stories about my daughter -- about my daughter's  
23 forgery, giving false testimony. That kind of  
24 story.

25 The last time when we were here with Ms.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

90

1 Holley and he was making false lies and saying I'm  
2 using my Twitter account and saying that the judge  
3 in New York was communist party and I didn't even  
4 have a Twitter account.

5 MR. HARBACH: Just so the record's clear  
6 today is the first that I've uttered a word in  
7 connection with this litigation in court. So I  
8 don't think you're talking about me, sir.

9 THE WITNESS: I was saying last time was  
10 from attorney in your office. The prior attorney  
11 before you called Andy Morse (ph) and was kicked out  
12 by the judge because he was making false claims for  
13 five years and was kicked out by the judge. So the  
14 law office was always making false claims.

15 MR. BALDIGA: Just answer his question  
16 because I can't know whether to object unless you're  
17 just trying to answer his question.

18 THE WITNESS: I didn't talk to my family,  
19 daughter and wife individually to say the same  
20 thing. If I say the same thing, same words, that  
21 will be making false story.

22 MR. HARBACH: I understand.

23 THE WITNESS: You cannot use your  
24 imagination and put it into my head. This is why  
25 the New York South District and the judge was

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

91

1 (indiscernible) by them and they give me the wrong  
2 sentencing.

3 UNIDENTIFIED: Can you say that last --

4 THE WITNESS: Because of their false  
5 claims, so that's why the judge from the south  
6 district of New York, the judge, gave me the wrong  
7 sentencing.

8 THE PRIVATE INTERPRETER: And also the  
9 interpreter did not interpret fully counsel's  
10 instruction to the witness previously about his  
11 objection.

12 MS. CLAIBORN: If you want to repeat it,  
13 go ahead.

14 MR. BALDIGA: I think you just have to  
15 listen to these questions and answer just these  
16 questions.

17 MR. HARBACH: Sorry. Counsel will move to  
18 a different topic.

19 BY MR. HARBACH:

20 Q Mr. Kwok, Ms. Claiborn asked you today  
21 about a \$21 million debt that you owe to Golden  
22 Spring. She asked you how much of that 21 million  
23 was legal fees and your answer was I think most of  
24 it.

25 I'd like to know what you meant by most of it.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

92

1 Did you mean \$11 million or do you mean close to \$21  
2 million.

3 A I don't remember.

4 Q Do you still believe that most of it was  
5 for legal fees?

6 A I don't remember.

7 Q You also mentioned the Logan Cheng  
8 settlement and that there was money borrowed from  
9 Golden Spring in connection with that.

10 A Yes.

11 Q How much money was that loan for?

12 A I don't remember exactly. Probably like  
13 200. Two -- \$300,000.

14 Q What were the terms of that loan from  
15 Golden Spring?

16 A I don't remember.

17 Q When Ms. Claiborn asked you if you had  
18 ever been to Golden Spring's offices in New York,  
19 you said yes.

20 What's the address of those offices?

21 A Yes.

22 Q What is the address of those offices?

23 A 64th Street, 162.

24 Q You also mentioned that the last time you  
25 were there was yesterday and that the reason you

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

93

1 went there was to prepare for today's meeting.

2 Who did you meet with there?

3 A My attorney.

4 Q Did you meet with anyone else besides your  
5 attorney to prepare for today's meeting while you  
6 were at the office?

7 A I don't know what you mean, the other  
8 people.

9 Q Well, did you meet with anyone who works  
10 for Golden Spring?

11 A Yes, I met Yvonne Wang.

12 Q And this was yesterday?

13 A Yes, I met her yesterday.

14 Q Did you ask some questions of her  
15 yesterday?

16 A No.

17 Q And tell me about your conversation with  
18 Ms. Wang?

19 A What do you mean?

20 Q Well, I'd like to know what you talked  
21 about with her.

22 A I ask her to arrange the food to eat and  
23 the coffee.

24 Q Is that all?

25 A And also we talked about how to abolish

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

94

1 communist party.

2 Q I want to make sure I get this right. I  
3 think you said --

4 MR. BALDIGA: Excuse me. Can I hear the  
5 last thing again.

6 THE WITNESS: We talk about how to abolish  
7 communist party.

8 MR. BALDIGA: Thank you.

9 Q Ms. Wang is an officer of Golden Spring,  
10 correct?

11 A Yes.

12 Q And you directed her to bring coffee,  
13 right?

14 A No, I didn't direct her. I'm just hoping  
15 her to bring some coffee.

16 Q You were hoping or helping?

17 A Help.

18 Q You were helping. Because my question to  
19 you was what you talked about with Ms. Wang. And I  
20 thought you said you asked her to bring some coffee  
21 or maybe even told her to bring some coffee.

22 A No, your attorney office -- your attorney  
23 office making and imagining things again.

24 Q I'll ask the question again.

25 MR. BALDIGA: Please ask a question. Don't

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

95

1 put words in his mouth.

2 Q What did you discuss with Ms. Wang  
3 yesterday?

4 A Do you want me to talk about in detail? I  
5 can talk about this for hours.

6 Q Well, no, not if the detail concerns how  
7 to overthrow the Chinese Communist Party. So I'll be  
8 more precise.

9 A So you don't want us to abolish Chinese  
10 Community Party. Our job is to abolish Chinese  
11 Communist Party.

12 MR. BALDIGA: Just answer the question.

13 THE WITNESS: You don't have a question.  
14 You're just directing something.

15 Q Sometimes I speak in segments to allow the  
16 interpreter to translate.

17 MR. BALDIGA: I think it would be helpful  
18 if you just ask question and then the witness --  
19 I'll instruct him to answer your questions. That  
20 would be helpful.

21 Q Did you discuss with Yvette [sic]  
22 yesterday anything related to preparing for the  
23 meeting today?

24 A Yes.

25 Q What did you discuss?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

96

1 A I ask her to bring those documents here.

2 Q Anything else?

3 A I don't remember.

4 Q When was Lamp Capital created?

5 A I don't know.

6 Q Why was Lamp Capital created?

7 A I don't know.

8 Q Who created Lamp Capital?

9 A My son.

10 Q How do you know that?

11 A Because I borrow money from my son to pay  
12 attorney fee.

13 Q The question is how do you know that your  
14 son created Lamp Capital?

15 A Because my son said it.

16 Q He told you himself.

17 A Yes.

18 Q Did he ask for any advice from you about  
19 whether to create Lamp Capital?

20 A No.

21 Q Did he ask you your opinion on whether he  
22 should create Lamp Capital?

23 A No.

24 Q Did he tell you why he was creating Lamp  
25 Capital?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

97

1 A No.

2 Q When you were talking about your  
3 malpractice claim against Boise Schiller, you  
4 mentioned someone you kept referring to as he. I'd  
5 like to know who that person is?

6 A I don't know what you mean.

7 Q Yes, that was a bad question. I apologize.

8 You stated that there was someone who gave  
9 false documents to the court without your  
10 permission. That this person threatened your  
11 family, that this person threatened you after  
12 drinking and that this person brought lots of loss  
13 to you and your family, including not providing  
14 translated documents before presenting them to the  
15 judge.

16 My question is who is that person?

17 A Schiller. The Attorney Schiller.

18 Q So Mr. Schiller of the Boise Schiller law  
19 firm. Have I got that right?

20 A Yes.

21 Q Thank you. Do you have an understanding of  
22 what business Lamp Capital is engaged in, if any?

23 A No.

24 Q Different subject. You said several times  
25 today in connection with your answers that the

Ho Wan Kwok - April 6, 2022

98

1 people behind me have done certain things.

2 Who are you talking about?

3 A One person behind me, there is a boss  
4 called Bruno Wu. He paid the case that -- the rape  
5 case from (indiscernible) rape case. Also there is  
6 a creditor here and that also was paid by Bruno Wu.  
7 That attorney fee was paid by Bruno Wu. And Bruno  
8 Wu is also his partner and he invested \$800 million.  
9 Bruno Wu's partner is also (indiscernible) previous  
10 officer and they were investigating and they  
11 combined a partner with them to investigate my case.

12 So April 18, 2017, so this (indiscernible)  
13 start suing me, bring the lawsuit. Within this 24  
14 hours Bruno Wu is sending me the red note and they  
15 start bringing the lawsuit.

16 MR. HARBACH: Can I stop --

17 THE WITNESS: The Chinese Communist Party  
18 stopped the interview, the VOA interview with me.  
19 They happened at the same time.

20 MR. HARBACH: Or I can let him go.

21 THE WITNESS: All the documents made by  
22 this attorney firm were all false. They provide a  
23 false document to the South District of New York  
24 court. They even false claim on my daughter's  
25 yacht. The boat is mine. They sought the judge

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

99

1 from the South District Court and I file the  
2 bankrupt -- personal bankruptcy case twice and the  
3 day -- they (indiscernible) twice including Ms.  
4 Holley. And Ms. Holley was present.

5 The first time when Ms. Holley was present  
6 in the court and they false testified saying -- and  
7 they said my daughter was giving false testimony for  
8 the Sherry bankruptcy case because my daughter never  
9 participated in that case.

10 And Ms. Holley was there, was present the  
11 second co date and Ms. Holley was there also. The  
12 attorney from the firm was telling the judge and  
13 they said that I used the Twitter account to -- and  
14 they said on the Twitter and I was saying on the  
15 Twitter the south district judge was communist party  
16 member.

17 You can see here all the people behind me  
18 and one is Bruno Wu and one person paid in many  
19 cases --

20 MR. HARBACH: I'd like to ask another  
21 question.

22 BY MR. HARBACH:

23 Q Are you aware one way or the other whether  
24 your bankruptcy counsel, the Brown Rudnick law firm,  
25 has ever previously represented Bruno Wu?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

100

1                   THE OFFICIAL INTERPRETER: Can I take a  
2 little break? I just can't concentrate as much.  
3 Just too much. Can I take a break?

4                   MS. CLAIBORN: Can I ask you to ask that  
5 question and then we'll take a break?

6                   THE OFFICIAL INTERPRETER: Yes. Can you  
7 repeat that question?

8                   MR. HARBACH: I'd be happy to.

9                   Q      Are you aware one way or the other of  
10 whether your bankruptcy counsel, the Brown Rudnick  
11 law firm, previously represented Bruno Wu?

12                  THE OFFICIAL INTERPRETER: Represent  
13 somebody else you said?

14                  MR. HARBACH: Yes. Bruno Wu.

15                  A      No.

16                  MS. CLAIBORN: I'm going to take a short  
17 break. We're going to be back here at 2:45.

18                  (Break)

19                  MS. CLAIBORN: All right. We are back on  
20 the record after a short break.

21                  Mr. Harbach, the floor is yours.

22                  MR. HARBACH: Thank you.

23                  BY MR. HARBACH:

24                  Q      Ms. Kwok, among the documents in front of  
25 you, document 78 filed in this case.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

101

1 THE OFFICIAL INTERPRETER: Which document?

2 This one?

3 MR. HARBACH: Yes. My apologies. Counsel  
4 advises me that your copies are not stamped.5 Q I'm talking about your official from 106.  
6 So my question for you starts on page 9, which  
7 contains a heading that says Schedule D, creditors  
8 who have claimed (indiscernible) by the property.  
9 Are you with me?10 You checked the box yes. And were  
11 directed to Schedule D, so that's where I would like  
12 you to flip to, please. And it's at page 18.13 MR. BALDIGA: What's the title? He can  
14 maybe find it better with the title.15 MR. HARBACH: Okay. It's the little chart  
16 that is Schedule D, which is a list of creditors  
17 with secured claims.

18 BY MR. HARBACH:

19 Q Mr. Kwok, you'll see that there are five  
20 separate entries for Golden Spring New York Limited.  
21 The data in each column is identical for all five  
22 rows.23 So my question is why are there five  
24 identical entries on this schedule?

25 The question is why are there five

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

102

1 identical entries on this schedule?

2 A I don't know what that means five --

3 Q Well, each row is exactly the same. And  
4 I'm just asking why there are five rows with the  
5 same information?

6 A I don't know.

7 Q Among that documents that you filed were  
8 some specific notes and one of those notes discusses  
9 the residence on Taconic Road.

10 MR. HARBACH: And for counsel I'm at  
11 document 77, page 4.

12 THE OFFICIAL INTERPRETER: Which page?

13 MR. HARBACH: Page 4.

14 THE OFFICIAL INTERPRETER: 84?

15 MR. HARBACH: No, Page 4.

16 THE OFFICIAL INTERPRETER: Oh, page 4.

17 Okay.

18 BY MR. HARBACH:

19 Q My question really isn't so much about the  
20 exact test as it is the substance.

21 So first question, is it true that all expenses  
22 related to the Taconic Road House are paid directly  
23 by family and family controlled enterprises?

24 A Yes.

25 Q Okay. Which family members?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

103

1 A My wife, sometimes by my son.

2 Q Which family controlled enterprises?

3 A Which country -- my wife.

4 Q Your wife's not an enterprise. I'm trying  
5 to ask which family controlled enterprises pay the  
6 expenses for the Taconic House?

7 A Greenwich LLC.

8 Q Okay. Incidentally, how do you know that  
9 your wife and sometimes your son pay these expenses?

10 A Because I live there.

11 Q Do you observe them pay the expenses?

12 A Yes.

13 Q Is that ever at your request?

14 A I don't remember I request anything.

15 Q Does Greenwich Land LLC -- yes Greenwich  
16 Land LLC own any other real estate besides 373  
17 Taconic Road?

18 A I don't know.

19 Q Do you know anything about the property  
20 located at 33 Ferncliff in Cos Cob, Connecticut?

21 THE OFFICIAL INTERPRETER: Can you repeat  
22 that?

23 MR. HARBACH: Yes.

24 Q 33 Ferncliff in Cos Cob, Connecticut.

25 THE OFFICIAL INTERPRETER: 31, right?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

104

1 MR. HARBACH: No, 33.

2 A Yes, now I remember it. It's also owned by  
3 my wife's company.

4 Q That being Greenwich Land?

5 A Maybe.

6 Q Do you know?

7 A I'm not sure.

8 Q Have you ever been to 33 Ferncliff?

9 A Yes.

10 Q How recently?

11 A No. Not recently.

12 Q Do you know when Greenwich Land purchased  
13 33 Ferncliff?

14 A I don't remember.

15 Q Do you know approximately how much money  
16 it cost?

17 A Probably more than \$1 million.

18 Q Does \$1.37 million sound about right?

19 A I'm not sure.

20 Q And does the approximate purchase date of  
21 September, 2019 sound about right to you?

22 A Not sure.

23 Q Turning back to 373 Taconic for a moment.  
24 How much was that property purchased for?

25 A Probably 400 to 500,000.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

105

1 THE PRIVATE INTERPRETER: No, no, no.

2 THE OFFICIAL INTERPRETER: 4 to 5 million.

3 I'm sorry.

4 Q Approximate time of purchase of 373

5 Taconic, if you know?

6 A I don't know.

7 Q Have you ever resided at 33 Ferncliff?

8 A No.

9 Q Do you know whether anyone currently lives  
10 there?

11 A Before there is another comrade maybe, you  
12 know, for disjoined Chinese Communist Party and he  
13 was to live there.

14 Q How long ago?

15 A Probably one to two years ago.

16 Q DO you remember that person's name?

17 A Yes.

18 Q What is it?

19 A Wong Din Gong (ph).

20 Q Does anyone currently live there, if you  
21 know?

22 A I don't know.

23 Q Talking about 373 Taconic, where did the  
24 money come from to purchase that property?

25 A I don't know.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

106

1 Q Do you know whether the house was  
2 purchased with cash or financing?

3 A I don't know.

4 Q Same questions for 33 Ferncliff. Do you  
5 know where the money came from to purchase that  
6 house?

7 A I heard it was purchased by cash.

8 Q From whom -- sorry. From whom did you hear  
9 that?

10 A I don't remember.

11 Q Do you know where that money came from?

12 A I don't know.

13 Q Do you know what Saraca Media Group is?

14 A Saraca?

15 Q Saraca.

16 A Saraca Media Group. I do.

17 Q What is Sircaca Media Group?

18 A Just Saraca. It's a company.

19 Q What kind of company?

20 A I'm not sure.

21 Q Have you ever had any relationship with  
22 Saraca personally?

23 A No.

24 Q Do you know anything about the type of  
25 business that Saraca conducts?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

107

1 A I remember they are related to GTV Media  
2 platform, or they invested on the GTV Media  
3 platform.

4 Q How do you know that?

5 A Because I was their consultant, who owned  
6 the consultant. And also I was the GTV host. And  
7 also this is one of the input and platform for  
8 disjoined communist party.

9 Q When you said you were a consultant a  
10 moment ago was that for Saraca or for GTV?

11 A GTV.

12 Q Has Saraca ever been -- ever had the 162  
13 East 64th Street address associated with it?

14 THE OFFICIAL INTERPRETER: Which address?  
15 Can you repeat that one.

16 Q Yes. 162 East 64th Street. The question  
17 is whether Saraca has ever been associated with that  
18 address?

19 A I don't know.

20 Q That is the family office address,  
21 correct?

22 A It's one of them.

23 Q Where are the other ones?

24 A I don't know.

25 Q Are there any others in New York City?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

108

1 A I just want to clarify. Golden Spring is  
2 one of the companies in this building, 162.

3 Q Understood and thank you.

4 We've referred to the family office during  
5 your questioning and I just want to be clear. When  
6 we talk about the family office are we referring to  
7 that address on East 64th Street?

8 A Yes.

9 Q Has GTV ever been associated with the  
10 family office address?

11 A I don't know.

12 Q Who owns Saraca?

13 A My son.

14 Q Since when?

15 A I don't know.

16 Q Does Saraca currently exist?

17 A I don't know.

18 Q Do you have any idea how many -- do you  
19 know anything about the value of Saraca's assets?

20 A I don't know.

21 Q Do you know anything about payments Saraca  
22 has made to GTV?

23 A No, I don't know.

24 Q Has your wife ever told you about any  
25 multi-million dollar payments from Saraca to

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

109

1 Greenwich Land?

2 A I don't know.

3 Q You don't know whether he's ever told you  
4 or you don't know about the payments?

5 A She never told me and I don't even know  
6 how much.

7 Q Do you know a company called Ziba Limited,  
8 Z-I-B-A?

9 THE OFFICIAL INTERPRETER: Ziba, Z-I-B-A?

10 MR. HARBACH: Yes.

11 A I don't know.

12 Q I'm sorry if I've already asked this.  
13 What is the relationship, if any, between Saraca and  
14 GTV?

15 A Saraca is the investor for GTV.

16 Q Do you know how much money Saraca invested  
17 in GTV?

18 A I don't know.

19 Q When was GTV founded?

20 A 2020. Maybe 2019. Not very sure.

21 Q Do you know the names of any of the  
22 officers or directors of Saraca?

23 A I don't know.

24 Q Do you know whether Yvette Wang is an  
25 officer or director of Saraca?

Ho Wan Kwok - April 6, 2022

110

1 A I don't know.

2 Q Do you know someone called Hong Chung  
3 Wang?

4 A Yes.

5 Q Who is that?

6 A He's my partner and also comrade for  
7 disjoined Communist Party.

8 Q Is he a friend of yours?

9 A Friend, comrade and a partner.

10 Q What do you mean by partner?

11 A Because we had a business corporation.

12 Q Tell me about that.

13 A Well, I don't remember the name of that  
14 company. It's a company for investigating Communist  
15 Party in USA doing money laundering and committing  
16 crimes.

17 Q Was it a for profit company?

18 A I don't know.

19 Q You don't know?

20 A I don't know.

21 Q What was the name of the company?

22 A I don't remember when getting to English.  
23 I don't remember the name.

24 Q Approximately what time frame where you  
25 partners with Hong Chung Wang in this company?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

111

1 A I don't remember.

2 Q Within the last three years?

3 A It must be more than three years ago.

4 Q More than ten years?

5 A No.

6 Q Did Hong Chung Wang ever have any  
7 connection to Saraca?

8 A I don't know.

9 Q Was he ever an officer or director of  
10 Saraca?

11 A I don't know.

12 Q What does the G in GTV stand for?

13 A God. The Goal, like in -- G-O-A-L.

14 Q The English word "goal"?

15 A Yea. Goal or God.

16 Q Okay. How long have you known Hong Chong  
17 Wang?

18 A I don't remember.

19 Q More than ten years?

20 A Roughly.

21 Q And do you still consider him a friend  
22 today?

23 A Yes.

24 MR. HARBACH: Just a moment, please.

25 Q There's been many questions today about

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

112

1       Golden Spring funding your living expenses.

2                  Is it correct that as far as your living  
3                  expenses are concerned that none of that is expected  
4                  to be repaid?

5                  A      Yes, true.

6                  Q      And so those monies are not the subject of  
7                  any formal agreement, correct?

8                  A      No.

9                  Q      And those monies essentially then are a  
10                 gift to you, correct?

11                 A      Yes.

12                 Q      What's the Rule of Law Foundation?

13                 A      What does that mean?

14                 Q      The question is what is it?

15                 THE OFFICIAL INTERPRETER: The Rule of Law  
16                 Foundation?

17                 MR. HARBACH: Yes, sir.

18                 THE OFFICIAL INTERPRETER: I didn't get  
19                 it. Can you ask it another way?

20                 Q      There's an entity called --

21                 THE OFFICIAL INTERPRETER: Oh.

22                 Q      -- the Rule of Law Foundation.

23                 THE OFFICIAL INTERPRETER: Okay.

24                 MR. HARBACH: I'll hopefully save some  
25                 time by just asking this question instead.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

113

1 Q Are you familiar with the Rule of Law  
2 Foundation?

3 A Yes.

4 Q Were you involved in its establishment?

5 A Yes.

6 Q Did you contribute any money to it when it  
7 was formed?

8 A Not myself.

9 Q Did you direct any entity to contribute to  
10 the Rule of Law Foundation?

11 A Suggestion in a direct and suggesting any  
12 difference --

13 Q If there was a suggestion, please tell me  
14 it was a suggestion.

15 A I didn't direct anybody or order anybody.  
16 I just always suggest people to make donations for  
17 the Foundation.

18 THE PRIVATE INTERPRETER: As an  
19 interpreter, I think that if the witness is asking  
20 the interpreter questions, the interpreter should  
21 interpret the question asked by the witness instead  
22 of answer that question.

23 THE OFFICIAL INTERPRETER: I can answer  
24 anything.

25 THE PRIVATE INTERPRETER: The witness said

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

114

1 are you talking about the (indiscernible) --

2 THE OFFICIAL INTERPRETER: That's why I  
3 relayed the questions to the attorney.

4 THE PRIVATE INTERPRETER: You answer him  
5 yes, and then you say that.

6 THE OFFICIAL INTERPRETER: Oh, for God's  
7 sake. I didn't say -- did I miss anything?

8 (Interpretation.)

9 THE OFFICIAL INTERPRETER: Okay. No  
10 question. He said no question was not answered.

11 BY MR. HARBACH:

12 Q Did you ever suggested to any of your  
13 family members that they donate to the Rule of Law  
14 Foundation?

15 A Yes, I did suggest.

16 Q Did any of your family members or the  
17 family controlled enterprises contribute money to  
18 the Rule of Law Foundation?

19 A Yes.

20 Q How much money?

21 A For cash there is one -- over \$1 million.

22 From Hong Kong, Japan and Mainland -- in  
23 China and all combined it should be more than 30  
24 million.

25 Q And just focusing for the moment on

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

115

1 contributions from your family at your suggestion.

2 Approximately, how much money is that?

3 A I don't know the details. Because of  
4 security reasons they don't want me to know.

5 Q Did you say a moment ago that your family  
6 contributed over a million dollars?

7 A One million cash is in New York here.

8 Q When was that?

9 A I don't remember.

10 Q Is the reason -- well, let me ask it this  
11 way. Did you suggest an amount to your family  
12 members that they should contribute to the Rule of  
13 Law Foundation?

14 A I want them to donate the more the better.

15 Q Is that what you told them?

16 A Yes.

17 Q Do you know whether the Rule of Law  
18 Foundation is associated with the family office  
19 address on 64th Street?

20 A Yes.

21 Q Did you ever make a \$100 million donation  
22 to the Rule of Law Foundation in November of 2018?

23 THE OFFICIAL INTERPRETER: Can you repeat  
24 that again?

25 Q Did you ever make a \$100 million donation

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

116

1 to the Rule of Law Foundation in November, 2018?

2 A No. In the live stream like I want --  
3 tried to collect the funds, in the live stream show.

4 Q Did you ever --

5 MR. BALDIGA: Wait. Was that his whole  
6 answer?

7 THE OFFICIAL INTERPRETER: Yeah. Something  
8 wrong?

9 THE PRIVATE INTERPRETER: Not quite  
10 exactly what the witness said.

11 (Indiscernible) broadcasting is okay.  
12 Live stream is okay. But collect money --

13 THE OFFICIAL INTERPRETER: Asking for  
14 donation, right?

15 (Interpretation)

16 THE PRIVATE INTERPRETER: Raise --

17 THE WITNESS: Raising money, raise  
18 donations. Yeah, in the live stream broadcast  
19 thing, or whatever, you know, asking for donations  
20 to -- you know, to raise funds, to raise money.

21 Q Did you ever promise to donate \$1 billion  
22 to the Rule of Law Fund?

23 THE OFFICIAL INTERPRETER: 10 billion you  
24 said?

25 MR. HARBACH: No, sir. 1 billion.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

117

1 THE OFFICIAL INTERPRETER: Oh, one  
2 billion.

3 A I don't remember. I don't remember.

4 Q Do you mean that it's possible that you  
5 made that promise?

6 A So we could reach that goal if we combine  
7 the organizations all over the world.

8 Q Understand. And it's a simple question. I  
9 just don't know the answer.

10 A Did you yourself ever promise to donate \$1  
11 billion to the Rule of Law fund?

12 A In the past five years I did the live  
13 stream over 5,000 times. Some of the live stream  
14 could have reached four or five hours. It's hard  
15 for me to remember every sentence I said.

16 Q Well, I understand that, but I'm only  
17 asking about one issue. And it is whether you ever  
18 promised publicly, or privately or anyhow to donate  
19 \$1 billion to the Rule of Law Fund?

20 A THE PRIVATE INTERPRETER: He did not say  
21 invest.

22 A MR. HARBACH: Donate

23 A THE OFFICIAL INTERPRETER: Yeah, donate.

24 A I don't remember.

25 Q I'll ask this one one more time.

Ho Wan Kwok - April 6, 2022

118

1                   Are you saying that it is possible that  
2 you made such a promise. You just can't be sure?

3                   A     In front of Ms. Holley I wouldn't say  
4 anything is possible but this is a very serious  
5 issue. Now they start the scheme again.

6                   Q     Well, this isn't what did you have for  
7 breakfast three days ago. This is did you promise  
8 to donate \$1 billion and if the answer is you don't  
9 know, that's okay.

10                  MR. BALDIGA: I think that's what the  
11 answer has been.

12                  MR. HARBACH: No, the answer has been I  
13 don't remember.

14                  MR. BALDIGA: Don't remember.

15                  MR. HARBACH: Yes, sir. That's a little  
16 different.

17                  Q     So the answer might be no, but you're not  
18 saying no. You're saying you don't remember.

19                  A     I said it three times, I don't remember.

20                  MR. BALDIGA: There's no question --

21                  A     Because in the past five years  
22 (indiscernible) always making these kind of answers  
23 for me so that's why the judge from the South  
24 District were fooled by you and you started again --

25                  Q     I'll move on.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

119

1           A     In the South District court I only met  
2        judge 20 seconds. I didn't say one sentence within  
3        this five years and I was fined a total about \$300  
4        million because that's what they did.

5           MR. BALDIGA: All right. Let's stop it.  
6        Let's wait for a question and we'll answer the  
7        question.

8           MR. HARBACH: Bill, I appreciate your  
9        patience. I'll move on.

10          MR. BALDIGA: Translate what I said,  
11        please.

12          THE OFFICIAL INTERPRETER: Can you repeat  
13        that? Everybody's saying at the time.

14          MR. BALDIGA: Ask a question and he'll  
15        answer a question.

16          Q     Have you made any donations to the Rule of  
17        Law Foundation in the last two years?

18          A     Myself, right?

19          Q     Yes, sir.

20          A     No.

21          Q     Have you suggested to any of your family  
22        that they make donations to the Rule of Law  
23        Foundation within the last two years?

24          A     I don't remember.

25          Q     Would you ever have made a promise to

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

120

1       donate \$1 billion to the Rule of Law Foundation if  
2       you did not actually have that money?

3                   MR. BALDIGA: Objection to form.

4                   THE OFFICIAL INTERPRETER: I didn't get  
5       it. Can you repeat one more time.

6                   Q     Would you have ever made a promise to  
7       donate \$1 billion to the Rule of Law Foundation if  
8       you did not actually have that money.

9                   MR. BALDIGA: And I objected.

10                  MR. HARBACH: And then Bill objected.

11                  THE OFFICIAL INTERPRETER: He said are you  
12       -- want to sentencing me to death sentence?

13                  Q     Approximately how much is the Lady May  
14       worth?

15                  A     I don't know.

16                  Q     Over the years that you have been aboard  
17       the Lady May, approximately how many times have you  
18       invited friends to join you?

19                  THE OFFICIAL INTERPRETER: Can you repeat  
20       that question one more time?

21                  MR. HARBACH: Yes.

22                  Q     Over the years that you had been aboard  
23       the Lady May, approximately how many times have you  
24       invited friends out to join you?

25                  MR. BALDIGA: Hold on.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

121

1 MR. HARBACH: Sorry, Bill.

2 MR. BALDIGA: David, you have a deposition  
3 on the Lady May issues coming up. You can choose  
4 today or then. Either one is fine.

5 MR. HARBACH: That's a fair point. I'll  
6 move on.

7 MR. BALDIGA: Okay. No question.

8 MR. HARBACH: If I could direct counsel's  
9 attention again to document 77. And I want to focus  
10 on question 19.

11 Q Mr. Kwok, let me know when you're read  
12 that question. It's no. 19.

13 (Pause.)

14 A Finished.

15 Q Okay. So for the benefit of the record,  
16 the question says within ten years before you filed  
17 for bankruptcy did you transfer any property to a  
18 self settled trust or similar device of which you  
19 are a beneficiary?

20 A No.

21 Q And that is indeed what you checked on the  
22 form. My question for you is if you turn -- if  
23 changed the word you to a family member as the  
24 beneficiary, what would the answer be?

25 MR. BALDIGA: Objection.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

122

1 A I cannot answer questions with if.

2 Q I'll ask it a different way.

3 MR. HARBACH: And, Jack, I'll ask you to  
4 bear with me.

5 Q Within ten years before you filed for  
6 bankruptcy did you transfer any property to a self  
7 settled trust or similar device of which a member of  
8 your family is a beneficiary?

9 A No.

10 Q Sticking with that same document going  
11 forward to question 27. Just let me know when  
12 you're read it, sir.

13 (Pause.)

14 A Okay. I'm finished.

15 Q So you see there you have checked the box  
16 next to the word yes. And then the instructions say  
17 check all that apply above and fill in the details  
18 below for each business.

19 MR. HARBACH: Do you see where that is,  
20 Jack?

21 THE OFFICIAL INTERPRETER: I didn't see  
22 that.

23 MR. HARBACH: Next -- Holley can show you.

24 (Pause.)

25 MR. HARBACH: So I was just pointing out

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

123

1 to the witness -- for the benefit of the translator  
2 I'll say it again.

3 Q Next to the box that is checked yes, the  
4 instructions say check all that apply above and fill  
5 in the details below for each business. None of the  
6 boxes above is checked and that's my question.

7 Which box or boxes should be checked for  
8 each of those three entities that you have listed?

9 A I cannot determine which one.

10 Q Is that something you would need more time  
11 to figure out or you just don't know the answer?

12 A I could answer one by one.

13 Q Okay. Let's do that. Let's start with  
14 Genever.

15 A Which Genever?

16 Q Well, the one that's listed is Genever  
17 Holdings Corporation.

18 Which of those boxes would you check for  
19 Genever Holdings Corporation, if any?

20 A It was one time -- it was a member of LLC.  
21 The above don't apply and should transfer to no. 12  
22 -- transfer to 12.

23 It used to be an LLC.

24 Q Are you saying that you would check the  
25 box for a member of an LLC but it should be in the

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

124

1 past tense?

2 A Yes. Used to be.

3 Q Do any of the other boxes apply to your  
4 relationship to Genever Holdings Corporation?

5 A The last row seems like appropriate for  
6 me. I'm not very sure.

7 Q The last row being an owner of at least  
8 five percent of the voting or equity securities of a  
9 corporation?

10 A I owned 50 percent for a very short period  
11 of time.

12 Q Okay. What about for Shiny Time?

13 A Shiny Time already went away.

14 Q I understand. When it was in existence,  
15 which of those boxes was accurate?

16 A Number one.

17 Q A sole proprietor?

18 A Yes.

19 Q Any of the others?

20 A Not sure.

21 Q Okay. What about for Well Origin Limited?

22 A It went away.

23 Q Okay. Same question though. Which of  
24 those boxes applied when it was in existence?

25 A Number one.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

125

1 Q Any of the others?

2 A Not sure.

3 Q One last point about this question.

4 For Genever Holdings Corporation the block  
5 for the dates that the business existed is blank.

6 Do you know what those dates should be?

7 A 2015. Probably March, April to June,  
8 July.

9 Q Of which year?

10 A 2015.

11 Q So from approximately March or April until  
12 approximately July all in 2015?

13 A Yes.

14 Q Okay. And is that the entire duration  
15 that that corporation existed?

16 A I was in the company for a few months, for  
17 this period of time, a few months and with holding -  
18 - in stock holding. And the company still existed  
19 after I left.

20 Q I understand. And does it still exist  
21 today?

22 A I believe it still exists.

23 Q Okay. In what year did you get married?

24 A 1918 -- or 1985.

25 Q What year was your son born?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

126

1 A 1986.

2 Q And how old are you, sir?

3 A 54.

4 Q How old was your son when your family  
5 began working with Uda Property Company?

6 A 11. Oh, five years -- five years old.

7 Q And so that would have been in  
8 approximately 1991 that your family began working  
9 with Uda?

10 A Yes.

11 Q When was the Henan Uda Hotel completed?

12 A In 1997.

13 Q And what about the Uda International Trade  
14 Center. When was it completed?

15 A At pretty much the same time.

16 Q In your declaration in this case you  
17 stated that both of those were successful ventures.

18 A Yes.

19 Q That allowed your family to start amassing  
20 significant wealth.

21 A Yes.

22 Q So recognizing that this is in the early  
23 '90's how much money approximately did those  
24 ventures bring to your family?

25 A I don't remember.

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

127

1 Q More than \$50 million?

2 THE OFFICIAL INTERPRETER: 50 or 15?

3 MR. HARBACH: 5-0.

4 THE OFFICIAL INTERPRETER: Oh, okay.

5 A I don't remember.

6 Q What about the Pengu Plaza? When was it  
7 completed?

8 A July 2008.

9 Q So between the early '90's and 2008 what  
10 other projects of significant did the Guo family  
11 invest in or participate in?

12 THE OFFICIAL INTERPRETER: Since 1990's to  
13 --

14 A Between the early 1990's and 2008.

15 Q Do you remember any of them? Any of the  
16 significant ventures?

17 A Beijing Golden Spring.

18 Q What was that?

19 A It's a property company. Real estate.  
20 It's a real estate company.

21 Q Was this a development company or a --  
22 like a buying and selling agency?

23 A Developing company.

24 Q When was the Pangu Plaza project started,  
25 approximately?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

128

1 A Roughly 1999.

2 Q Okay. So let's use that as a point in  
3 time.4 At the beginning of the Pangu Plaza  
5 project approximately how much had the family  
6 amassed in wealth?7 THE PRIVATE INTERPRETER: Ask that  
8 question again?

9 MR. HARBACH: Sure.

10 Q As of 1999, which was the beginning of the  
11 Pangu Plaza project, approximately how much wealth  
12 had the family earned or amassed by that time?13 THE OFFICIAL INTERPRETER: You're talking  
14 about after 1999?15 MR. HARBACH: No, I'm talking about as of  
16 1999?

17 THE OFFICIAL INTERPRETER: Oh, as of 1999.

18 Q How much money had the family made by  
19 1999?

20 A I don't remember.

21 Q More than \$100 million?

22 A I don't remember.

23 Q More than \$500 million?

24 A I don't remember.

25 Q More than a billion dollars?

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

129

1 A I don't remember.

2 Q Were you personally involved in the work  
3 with Uda Property Company?

4 A Yes.

5 Q Were you personally involved in the  
6 development of the Henan Uda Hotel?

7 A Yes.

8 Q Were you personally involved in the Uda  
9 International Trade Center in Zhengzhou?

10 A Yes.

11 Q Were you personally involved in the  
12 development of the Penguin Plaza?

13 A Yes.

14 Q Who was in charge of the Beijing Golden  
15 Spring Real Estate Development firm?

16 A A professional group.

17 Q Were you a member of that group?

18 A At that time I was a consultant.

19 Q For Beijing Golden Spring?

20 A Yes.

21 Q During what time frame was that,  
22 approximately that you were a consultant for them?

23 A After 2000.

24 Q After 2000. Okay.

25 MS. CLAIBORN: Mr. Harbach, I just want to

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

130

1 note that it is 4:18 and I know we've had a long day  
2 -- and I wanted to give -- I apologize for  
3 interrupting you, first of all.

4 MR. HARBACH: That's all right.

5 MS. CLAIBORN: But I wanted to give  
6 counsel for the committee a chance to ask a few  
7 questions today before we conclude.

8 MR. HARBACH: Of course. Sure.

9 MR. STAFSTROM: I'll be very brief.

10 EXAMINATION BY MR. STAFSTROM:

11 Q I noticed your hair is very short. I like  
12 it. Have you gotten a haircut recently?

13 A Yes. I had a haircut.

14 Q Where did you get it cut?

15 A My wife.

16 Q Oh, your wife. Okay.

17 Does she always cut your hair?

18 A After the virus until now.

19 Q Okay. All right. I have no further  
20 questions then.

21 MS. CLAIBORN: I'm going to put the  
22 recording on pause while we work on selecting a new  
23 date.

24 (Off the record.)

25 MS. CLAIBORN: We're back on the record

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

131

1 after a short break. We have selected a continuance  
2 date of April 29th, beginning at 10:00 a.m. We are  
3 concluded for today. Thank you.

4 (Meeting adjourned.)

5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

132

1 I, CHRISTINE FIORE, court-approved  
2 transcriber and certified electronic reporter and  
3 transcriber, certify that the foregoing is a correct  
4 transcript from the official electronic sound  
5 recording of the proceedings in the above-entitled  
6 matter.

7

8

*Christine Fiore*

9

April 15, 2022

10 Christine Fiore, CERT

11 Transcriber

12

13

14

15

16

17

18

19

20

21

22

23

24

Fiore Reporting and Transcription Service, Inc.

Ho Wan Kwok - April 6, 2022

133

## INDEX

	<u>Page</u>
Examination by Ms. Claiborn	6
Examination by Mr. Wolman	71
Examination by Mr. Harbach	80
Examination by Mr. Stafstrom	130

Fiore Reporting and Transcription Service, Inc.